

# Habitats Regulations Assessment

## Havering Local Plan: Main Modifications and Further Modifications

London Borough of Havering

June 2021

## Quality information

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## Revision History

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## Table of Contents

1.	Introduction.....	5
2.	Likely Significant Effects of Main Modifications and Further Modifications .....	6
3.	Conclusion.....	66

## Tables

Table 1.	Likely Significant Effects of Main and Further Modifications .....	7
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# 1. Introduction

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

## 2. Likely Significant Effects of Main Modifications and Further Modifications

- 2.1 This section sets out the assessment of each Main Modification and Further Modification. The modifications are presented in the first three columns of the table below. The assessment of likely significant effects is then presented in the fourth column.

**Table 1. Likely Significant Effects of Main and Further Modifications**

Ref. Number	Policy/ Para.	Proposed Modification	Likely Significant Effects
FMM1	New para. between 1.1.5 and 1.1.6	<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 2019 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 will be set out in the Council's Local Development Scheme.</u></p>	No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites
FMM2	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>47,550</del> 18,930 dwellings over the Plan period;</li> </ul>	No Likely Significant Effect – the HRA of the submitted plan confirmed no likely significant effects due to an absence of impact pathways to European sites. This further modification does not change that conclusion.
FMM3	5.1 Spatial Strategy	<p><b>Key Features of the Spatial Strategy</b></p> <p><b>Housing Growth</b></p> <p>Delivery of at least <del>47,550</del> 18,930 high quality homes over the 15 year Plan period;</p>	No Likely Significant Effect – the HRA of the submitted plan confirmed no likely significant effects due to an absence of impact pathways to European sites. This further modification does not change that conclusion.
MM1	New para. 1.1.8	<p><b>Section 1 Overview: 1.1 What is the Local Plan?</b></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>	No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites

- Core Strategy (2008)
- Development Control Policies (2008)
- Proposals Map (2008) - will be superseded by a new Proposals Map for the Local Plan and this will include the changes identified in the Proposals Map Changes booklet(s) and those elements of the existing Proposals Map which will be unchanged.
- Sustainable Design and Construction (2009)
- Planning Obligations (2013) will be superseded by the introduction of Havering CIL (2019)

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.

MM2	Strategic Objectives	<p><b>Section 3 : Strategic Objectives</b></p> <p>Para 3.2.1 Add new criterion to paragraph 3.2.1 as follows :</p> <p><u>xxii. Support greater use of the River Thames for freight and passenger transport</u></p> <p>and renumber the final criterion as xxiii.</p>	No Likely Significant Effect – increased industrial activity is assessed within the existing HRA. Therefore, the conclusions of no likely significant effect to European Sites remains the same.
MM3	Policy 1	<p><b>Section 6 : Strategic Development Areas : 6.1 Romford Strategic Development Area</b></p> <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 <del>6,000</del> <sup>5,300<sup>(2)</sup></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>ix.</del> <u>x.</u> Continue to work with partners to secure significant improvements to Romford station;</p> <p><del>xi.</del> <u>xii.</u> Support the delivery of Crossrail services to Romford and improvements to the public realm in the vicinity of the station;</p> <p><del>xii.</del> <u>xiii.</u> Support the delivery of a new east-west shared use link from the railway station across the River</p>	No Likely Significant Effect – there are no impact pathways connecting growth in Havering with European sites



Rom to the existing and new residential areas to the west;

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

Renumber the policy criteria and insert text as follows :

### **Social infrastructure**

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

- ~~xviii.~~ xxi Romford Leisure Centre
- ~~xix.~~ xxii New and enhanced public open spaces
- ~~xx.~~ xxiii A new health hub, including the sexual health services relocated from Queens Hospital;
- ~~xxi-xxiv.~~ Additional school places in line with the Council's Commissioning Plan and Schools Expansion Programme over the Plan period;
- ~~xxii-xxv.~~ Additional primary school provision equivalent to 3 forms of entry (FE) in the first 5 years of the Plan and a further 6FE need for primary school places beyond the first five years. A 3 form of entry primary school (630 places) has been approved on the Bridge Close development site and the new school should be sufficient to meet demand for the additional primary places needed over the next five years. A further 6FE need for primary school places beyond the first five years
- ~~xxiii-xxvi.~~ xxvi A 6/8FE secondary school in the second phase of the Plan period (5-10 years);

Development proposals that generate a primary school child yield equivalent to one additional form of entry will be expected to provide adequate space on site for the provision of a school. The Council will only support proposals without this provision where it can be robustly demonstrated that existing or planned education provision can cater for the additional demand for school places.

Renumber the policy criteria and insert text as follows :

### **Design and Heritage**

The Council will require development in Romford town centre to be of high architectural and urban design quality. Development and uses must be appropriate to and will be expected to improve the function, appearance, and character of the town centre.

The Council will support proposals that:

- ~~xxii.~~ xxvii. Create active streets with strong and well-articulated frontages to all existing and proposed pedestrian routes, particularly at ground floor level, avoiding blank facades and exposed service areas;
- ~~xxiii.~~ xxviii. Incorporate generous floor to ceiling heights at ground floor level to provide for flexibility and adaptability over time and respond to the needs of different retailers. To achieve a vibrant and thriving Town Centre there will need to be a mix of uses throughout the Romford Strategic Development Area (RSDA). It is envisaged that this will include residential, retail, commercial, leisure and arts uses. It is intended that the preferred locations for these different uses within the Town Centre will be identified through the ongoing master planning process for Romford. To facilitate delivery of these uses, the design of the ground floor of a mixed use development within RSDA should have a minimum floor-to-floor height of 3.5m to allow flexibility for future changes and adaptability over time. This is a recommended dimension for floor-to-floor height, as the floor-to-ceiling height in retail or commercial development will depend on individual occupier fit out requirements. Commercial buildings, given their likely increased service requirements will generally require a minimum floor-to-ceiling height of 3.5m to 4m.
- ~~xxiv.~~ xxix. Positively respond to the sensitive nature and urban fabric within the Conservation Area, views of St. Edward the Confessor Church and the historic crossroads where South Street, the High Street and the Market Place meet;
- ~~xxv.~~ xxx. Make a positive contribution towards public realm improvements in the Market Place;
- ~~xxvi.~~ xxxi. Demonstrate how the proposed scheme responds to wider development opportunities, movement and environmental enhancements in the town centre;
- ~~xxvii.~~ xxxii. On major development sites open up access to the River Rom and positively incorporate the river into the development scheme(s);
- ~~xxviii.~~ xxxiii. Optimise the design and location of development including the incorporation of resilience measures to address potential flood risk, where appropriate; and
- ~~xxix.~~ xxxiv. Respond to the local character and context and make a positive contribution to the skyline. Tall buildings may be acceptable in the vicinity of the station subject to high quality design and strong public realm propositions at ground level. Proposals for tall buildings within the Conservation Area and north of the railway line along south street are inappropriate. ~~The heights of proposed new buildings in this area will need to respond positively to the historic context. Elsewhere in the town centre the height of proposed buildings should respond to local character and context, and make a positive contribution to the skyline in Romford town centre.~~

<sup>2</sup> at least ~~4,750~~ 5,000 homes will be built over the first 10 years of the plan period

Proposed modifications to explanatory text :

Text added to, and deleted from, paragraph 6.1.22 of the explanatory text as follows :

6.1.22 Education provision is particularly challenging in Romford. Existing schools within the area are already at full capacity and whilst the Council's school expansion programme will assist in meeting future demand, this will not offer sufficient capacity over the Plan period. In order to meet the need for primary school places in the Romford area a 3 form of entry primary school (630 places) has been approved on the Bridge Close development site and the new school should be sufficient to meet demand for the additional primary places needed over the next five years. ~~over the next five years an additional 3FE will be needed. 1FE is likely to be delivered through expansion of an existing school and a new 2FE school will be needed.~~ There is a further 6FE need for primary school places beyond the first five years. This will need to be delivered through new schools. This will be addressed via the Site Specific Allocation Plan that will identify specific sites for future schools. If further sites come forward for housing development the Council will need to assess whether further education provision will be needed. A 6/8FE secondary school is required in the second phase of the Plan period (5-10 years). The Council will seek to identify sites suitable for additional education provision through the Romford Masterplan and Site Specific Allocations Local Plan.

Add new paragraph 6.1.30

6.1.30 Tall buildings may be acceptable in the vicinity of the station subject to high quality design and strong public realm propositions at ground level. Proposals for tall buildings within the Conservation Area are inappropriate. The heights of proposed new buildings in this area will need to respond positively to the historic context. Elsewhere in the town centre the height of proposed buildings should respond to local character and context, and make a positive contribution to the skyline in Romford town centre.

A tall building is generally understood to be anything which is of significantly greater height than its context. As Historic England note in the Tall Building Advice Note 4: "In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications". To determine the appropriate scale, height and form of development with the Romford Strategic Development Area the Council have commissioned consultants to work with the Council to develop a masterplan for Romford Town Centre. This piece of work will involve analysis, characterisation and building height studies to provide evidence to support a local height definition for tall buildings and the identification of appropriate locations with the Romford Strategic Development Area for such buildings beyond the definition within the Local Plan. The Romford Masterplan is envisaged to be adopted as a Supplementary Planning Document and will therefore provide clarity in due course in this area.

MM4		<b>MM number not used</b>	N/A
MM5	Policy 2	<b>Section 6 : Strategic Development Areas : 6.2 Rainham and Beam Park Strategic Development Area</b>  Amend and add new text to the fourth paragraph of the policy as follows :  <b>Commercial Development</b>	No likely significant effect – this change does not materially alter the total amount of residential development within the Plan period. Moreover, there are no linking impact pathways from growth in Havering to

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.

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.

New commercial development will be required to incorporate generous floor to ceiling heights of ~~3.75~~ 3.5m to 4m at ground floors of buildings in Beam Park Centre, and ~~3m at ground floors of buildings~~ along New Road to provide for flexibility for use as either retail or commercial spaces in the future.

Insert a new fifth paragraph in the policy as follows :

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.

Add a new policy criteria xx. and renumber the remaining criteria as follows :

### **Design and Heritage**

To ensure the successful transformation of the area, the Council will support development proposals which:

- xv. Adopt an integrated and comprehensive approach without prejudice to the achievement of the wider vision for the area as set out in paragraph 2.2.5;
- xvi. Provide a layout that facilitates a coherent urban structure across the area as a whole and demonstrate that the layout achieves a coherent structure both in its own right, and in terms of its facilitation of future phases;
- xvii. Better link the existing settlements of South Hornchurch and Orchard Village with Rainham Village, and transform New Road (the A1306) from a traffic dominated corridor into an attractive high quality green urban street commensurate with the adjoining new residential neighbourhoods;
- xviii. Overcome the barrier presented by the river and the industrial sites and bring significant enhancement of the wider area as an attractive place;
- xix. Respond positively to the context within Rainham Village strengthening and enhancing the character of this historic village;
- xx. Take account of and positively respond to the various listed buildings and their settings;
  
- xxi. Orientate buildings with their front and main entrance towards streets and open spaces to provide overlooking and natural surveillance and to help to create a place with a strong sense of place that is safe and welcoming;
- xxii. Have buildings designed at street corners that 'turn the corner' and address both street spaces;
- xxiii. Provide a good sense of enclosure to streets and public spaces with buildings positioned along consistent building lines;
- xxiv. Avoid adverse effects on the nearby Ingrebourne Marshes SSSI and Inner Thames Marshes SSSI and seeks to achieve enhancements to these sites, where possible; and

European sites. Therefore, the conclusions of the 2017 HRA are still appropriate.

- 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.

**FMM6 Policy 3 Section 7 : Successful Places to live : 7.1 Housing Supply**

Delete the first sentence from the second paragraph of the policy :

~~Over the full 15 year Plan period, at least 17,550 new homes will be built in Havering.~~

Replace the deleted sentence of the second paragraph of the policy (as above) with new text and update the figures and amend the text in the itemised points with the following :

In line with the London Plan ~~10-year~~ housing target for Havering, at least ~~11,701~~ 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:

- i. ~~5,300~~ 5,000 homes on major sites in the Romford Strategic Development Area;
- ii. 3,000 homes on major sites in the Rainham and Beam Park Strategic Development Area;
- iii. ~~700~~ 300 homes through the intensification and renewal of existing Council housing estates outside the Strategic Development Areas;
- iv. ~~400 homes on two large previously developed sites within the Green Belt; and~~ 1,500 homes on other major sites outside of the Strategic Development Areas and Council housing estates; and
- v. ~~2,790 homes on small sites across borough.~~ 1500 homes on small sites across the borough and through vacant units returning to use.

~~\*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 in accordance with the previous London Plan and an annual target of 1,285 units per annum for the following 7 years in accordance with the London Plan 2021.~~

Add new criteria viii. and ix. and renumber following criteria as follows :

The delivery of new homes will also be achieved by:

- vi. Promoting mixed use development in town centres and designated out of town centre locations;

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites, since the HRA of the submitted Local Plan confirmed there were no significant impact pathways linking growth in Havering to European sites.

- vii. Prioritising all non-designated land for housing when it becomes available;
- viii. Supporting the re-use of brownfield sites when they become available;
- ix. Supporting residential development proposals around stations where it is compatible with the character of the local area. Major development proposals around stations will be subject to design review;

~~viii~~ x. Supporting appropriate development of infill, under-utilised and vacant sites in the borough's sub-urban areas;

~~ix~~-xi. Resisting the net loss of residential development;

~~x~~-xii. Supporting initiatives to bring back empty residential properties into use;

~~xi~~-xiii. Supporting self-build initiatives; and

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

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

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

Table 1: Phased Targets

	Phase 1:	Phase 2:	Phase 3:
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*		

	<u>Phase 1:</u>	<u>Phase 2:</u>	<u>Phase 3:</u>
<u>Targets for net additional homes</u>	<u>2016/17-</u> <u>2020/21</u>	<u>2021/22-</u> <u>2024/25</u>	<u>2025/26</u> <u>2026/27-</u> <u>2030/31</u>
<u>Minimum dwellings per annum</u>	<u>700</u>	<u>1,640</u>	<u>1,641</u> <u>1,170</u>
<u>Total</u>	<u>3,500</u>	<u>8,201</u>	<u>5,850</u>
<u>10 Year Total</u>	<u>11,701</u>		
<u>15 Year Total</u>	<u>17,551</u>		



\*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

Proposed modifications to explanatory text :

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

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

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

<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>

\*roll forward to London Plan 2021 targets

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

~~Amend paragraph 7.1.4 of the explanatory text as follows:~~

~~7.1.4 As a result of the cumulative deficit of identified housing supply across the capital, the London Plan states that boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target. Boroughs are expected to draw on the housing benchmarks in developing their housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need and supply in line with the requirement of the NPPF. In line with the requirements of the London Plan, the Council will seek to deliver and exceed the minimum target set in the Plan, being 11,701 over a 10 year period. Over the 15 year lifetime of this Local Plan Havering's minimum housing target is therefore 17,550 as reflected in Policy 3. Havering will seek to deliver at least 17,551 new homes.~~



7.1.5 At a sub-regional level, Havering forms part of the Outer North East London Housing Market Area with the London Boroughs of Barking and Dagenham and Redbridge. The Council has worked with these authorities to prepare a sub-regional SHMA. A subsequent update has been prepared for Havering taking into account updated GLA household projections<sup>(9)</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.

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

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

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

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

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

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

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

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

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

~~7.1.12 Over the period 2004/05 to 2016/17 Havering has met or exceeding 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.~~

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

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

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

Table 2

Five Year Supply Based on a Stepped Trajectory as at Adoption (2019) using the Sedgefield Approach*	
Target	6320
Shortfall	414
Five-year target plus shortfall	6734
Application of 20% Buffer	8081 (6734 x 1.2)
Annualised target with 20% buffer	1616 (8081/5)

Supply	8624(2019—2023)
Supply divided by annualised target with 20% buffer	5.34 years supply (8624/1616)

~~7.1.40~~<sup>15</sup> A significant proportion of new housing development will be delivered in the two Strategic Development Areas and predominantly on large sites within these areas. Work is already underway in Havering to bring these sites forward and whilst construction will start within the first five years of the Plan, completion is more likely to be towards the end of this period and into the second phase. The Council is making every effort to bring forward these sites as quickly as possible in order to boost housing supply and meet the short term need for housing.

Renumber and amend paragraph 7.1.11 of the explanatory text as follows :

~~7.1.44~~<sup>16</sup> Full details of the Council's land supply and the approach to delivery housing over a 10 year period is set out within the Housing Position Statement October 2019: Technical Update supporting this Local Plan. This also includes ~~an action plan~~ Housing Implementation Strategy addressing the initiatives underway to increase housing supply.

Add a new paragraph 7.1.17 to the explanatory text and renumber following paragraphs as follows:

7.1.17 The Housing Position Statement identifies specific deliverable and developable sites for the first 10 years of the Plan. The Council is committed to ensuring that there is a sufficient supply of housing over the 15 year plan period and beyond and will therefore undertake an early update of the Plan. This update will begin immediately after adoption of the Local Plan.

~~7.1.42~~<sup>18</sup> As part of its strategy, the Council has looked at the scope for the Green Belt to provide land for new homes. It has undertaken a review against the functions of the Green Belt as set out in the NPPF. The Council is satisfied that all of the Green Belt in Havering fulfils its purpose and that having regard to the significant opportunities for new homes to come forward in Havering's built up area, there is no planning justification for releasing land from the Green Belt. Opportunities do exist on previously developed sites within the Green Belt at St George's Hospital in Hornchurch and Quarles Campus in Harold Hill.

~~7.1.43~~<sup>19</sup> In seeking to meet its objectively assessed housing need the Council explored and tested a number of alternative development strategies in its Sustainability Appraisal (SA) Report. The SA report demonstrates that the development strategy chosen by the Council is the most sustainable approach.

7.1.44~~20~~ The Council supports self-build initiatives to give local residents the opportunity to design, build and own their homes. Since May 2016, the Council has published a register for individuals and groups to express an interest in acquiring self-build and custom build plots in Havering. The Council will continue to monitor this register to gather up to date evidence of the level of interest for these types of homes and accordingly seek to make provision for meeting this need within the Site Specific Allocations Local Plan.

7.1.45~~21~~ Development densities should reflect the density matrix in the London Plan. However, the Council recognises that when determining an application, density is only one of a number of considerations and the density matrix should not be applied mechanistically. The Council will place a high priority on the quality and design of the scheme, the local context and the relationship with surrounding areas when determining whether a scheme is acceptable. It will always aim to optimise residential output and densities consistent with the London Plan for different types of location within the borough through encouraging higher densities of housing development in places with good levels of public transport accessibility.

Update and renumber Table 1 as follows:

Table 4-3: Housing Supply 2016-2026

Source of Supply	Net additional Homes 0-5 years	Net additional Homes 5-6-10 years	Total 10 year supply	Total 15 year supply
<b>Large Major sites within the Romford Strategic Development Area*1</b>	<del>1,361</del> <u>124</u>	<del>3,409</del> <u>5,117</u>	<del>4,770</del> <u>5,241</u>	<u>6,642</u>
<b>Large Major sites within the Rainham and Beam Park Strategic Development Area*</b>	<del>954</del> <u>590</u>	<del>2,074</del> <u>2,515</u>	<del>3,022</del> <u>3,105</u>	<u>3,105</u>

<sup>1</sup> \*Includes sites with planning permission

<b>LBH Estate Regeneration Schemes (outside the Strategic Development Areas)</b>	<del>55</del> <u>34</u>	<del>370</del> <u>410</u>	<del>315</del> <u>376</u>	<u>1,288</u>
<b>Large Other major sites outside the Strategic Development Areas*</b>	<del>1,758</del> <u>1,117</u>	<del>192</del> <u>503</u>	<del>1,950</del> <u>1,620</u>	<u>1,620</u>
<b>Small sites</b>	<del>930</del> <u>540</u>	<del>930</del> <u>900</u>	<del>1,860</del> <u>1,440</u>	<u>2,340</u>
<b>Vacant units returning to use</b>	<del>130</del> <u>78</u>	<u>130</u>	<del>260</del> <u>208</u>	<u>338</u>
<b><u>Completions 2016/17 and 2017/18</u></b>	<u>884</u>	<u>NA</u>	<u>884</u>	<u>884</u>
<b><u>Surplus from 2015/16</u></b>	<u>221</u>	<u>NA</u>	<u>221</u>	<u>221</u>
<b>Total</b>	<del>5,075</del> <u>3,520</u> 2,415	<del>7,102</del> <u>9,575</u>	<del>12,177</del> <u>13,095</u> 11,990	<del>16,438</del> 15,333

Source:

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

FMM7 Policy 4 **Section 7 : Successful Places to live : 7.2 Affordable housing**

Amend / insert additional text in the first paragraph of the policy as follows :

Having residents should have access to high quality, affordable new homes and the Council will seek to maximise affordable housing provision from development proposals. All developments of ~~more than 10 dwellings~~ 10 or more dwellings or residential developments with a site area of more than 1,000 square metres are required to provide at least 35% affordable housing based on habitable rooms (gross). Residential development on public sector land or on industrial sites where the scheme would result in a net loss of industrial capacity will be required to provide 50% affordable housing.

Proposals which do not meet the 35% or 50% thresholds set out above, 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.

Proposals that meet or exceed the 35% or 50% 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.

Proposed modifications to explanatory text :

Amend/ insert additional text to paragraph 7.2.2 of the explanatory text as follows :

7.2.2 The Outer North East London SHMA estimates that of the 30,052 new homes needed in Havering over the period 2011-2033, 35% (10,520) of these are required to be affordable. The Council, therefore, considers it appropriate to seek at least 35% affordable housing from new developments. This is also consistent with the London Plan and the Mayor's ~~Draft~~ Affordable Housing and Viability Supplementary Planning Guidance (2017~~6~~)

Update paragraph 7.2.5 of explanatory text as follows :

7.2.5 The Council supports a transparent approach to viability in line with the Mayor's ~~Draft~~ Affordable Housing and Viability Supplementary Planning Guidance (2017~~6~~). Applicants will be required to pay for an independent viability assessment by a third party where requested by the Council. The Council will use review mechanisms to ensure that new development delivers the appropriate amount of affordable housing as viability improves.

[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.](#)

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites

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.

Amend paragraph 7.2.7 of the explanatory text as follows :

7.2.7 Where a development proposal is considered to under-develop a site, the Council will consider negotiating an increase in the number of dwellings, and thus affordable housing provision, or consider refusing the application. The Council has established that development sites of more than 1000 square metres are potentially able to be configured to deliver ~~more than 10 residential~~ 10 or more residential dwellings and, therefore, contribute to affordable housing provision.

MM8 Policy 5 **Section 7 : Successful places to live : 7.3 Housing Mix**

Add to, and delete, text from the first, second and third paragraphs of the policy as follows :

The Council will support development proposals that provide a mix of dwelling types, sizes and tenures.

All housing schemes should include a proportion of family sized homes and reflect the recommended housing mix identified in Table 2 ~~3 unless~~ When considering the mix of dwelling sizes appropriate for a particular development proposal, the Council will have regard to it can be robustly demonstrated that a variation to the mix in Table 3 is justified having regard to individual site circumstances including location, site constraints, viability and the achievement of mixed and balanced communities.

Where proposals are seeking to provide retirement, sheltered or extra care housing, the Council recognises that there may be a need for greater flexibility with regard the mix of units to be provided within developments and the housing mix as set out in table 3 does not apply to such proposals ~~particularly in achieving the provision of 3 bedroom units.~~

No Likely Significant Effect – this change does not change the conclusions of the 2017 HRA to European sites.

MM9 Policy 6 **Section 7 : Successful Places to live : 7.4 Specialist accommodation**

Amend / insert additional text in policy criteria vii. and viii. as follows :

The provision of appropriate housing to meet the specialist needs of local people will be supported where it can be demonstrated robustly that:

- i. There is an identified need within the borough;
- ii. The site has access to essential services and shops by walking and cycling;
- iii. The site is well served by public transport;
- iv. The proposal contributes to a mixed, balanced and inclusive community;
- v. The site is suitable for the intended occupiers in terms of the standard of facilities, the level of independence, and the provision of and/or care;

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites.

- vi. An appropriate level of amenity space is provided to meet the needs of the intended occupants taking account of the need for an attractive outlook;
- vii. Consideration has been given to ~~all possible~~ future needs and the development can be easily adapted to meet the needs of future occupants;
- viii. The proposal does not have any unacceptable adverse impacts on the surrounding area and will not be likely to give rise to significantly unacceptable greater levels of noise and disturbance to occupiers of nearby residential properties;
- ix. The proposal meets the parking requirements set out in Policy 24 and will not have an unacceptable impact on parking conditions and traffic congestion in the area; and
- x. Adequate provision for visitor and carer parking facilities is provided, and where appropriate, provision is made for the safe and convenient storage of wheelchairs and mobility scooters.
- xi. meet other identified prioritised local need; or
- xii. The existing accommodation will be adequately re-provided to an equivalent or better standard on-site or elsewhere within the borough.

Proposed modifications to explanatory text :

Add a new paragraph 7.4.5 to the explanatory text as follows :

7.4.5 The London Plan 2016 states that boroughs should identify and address the local expression of older persons strategic housing needs, informed by indicative requirements set out in Annex A5 of the London Plan 2016. Havering's indicative requirement is identified as being 185 additional units per year.

Renumber and amend paragraph 7.4.5 of the explanatory text as 7.4.6 as follows:

7.4.5-6 In 2015, the Council ~~undertook a review of the~~ commissioned a report to identify the locally expressed need for specialist older people's housing within the borough. This ~~review report~~ looked at both the current and projected need for housing for older people and the specific types of specialist accommodation required. This report employed a model which draws heavily on both the GLA's model and the Housing LIN model, but then applies local information to ensure its relevance to Havering. The ~~review~~ report found that:

- There is a current and projected surplus of affordable Sheltered Housing Schemes in Havering and this is projected to continue even with projected population growth in the number of older people living in Havering.
- There is a current and projected deficit in sheltered/ retirement housing for lease and sale within Havering.
- There is a current and projected deficit in enhanced and extra care housing and specialist housing available for older people when their current home is no longer suitable due to physical and/or mental frailty or affordability

Delete paragraph 7.4.6 as follows :



~~These findings are in line with the indicative annual benchmark for the provision of additional specialist older person accommodation which is set out in the London Plan. In Havering, a need for 185 additional units per year has been identified of which 135 should be for private sale and 50 for intermediate sale. No need was identified for affordable rent products due to the current surplus.~~

Add a new paragraph 7.4.7 to the explanatory text and renumber the following paragraphs as follows :

7.4.7 In 2018, the report was reviewed and reached the same conclusions listed above. Overall, an annual need for 255 owner occupier/intermediate housing was identified. The report will continue to be reviewed every 3 years so that the Council is able to maintain an up-to-date understanding of identified need within the borough, taking into account changes in demographic projection, technological and building innovations and older person's assessment of how their own housing needs are best met.

~~7.4.78~~ To meet the needs of Havering's population and as part of the Council's estate regeneration programme, the Council is proposing to close four sheltered housing schemes and redevelop three others. Three of the four sites that are closing will be regenerated to provide high quality general needs housing and one will provide high quality general needs flats for residents over the age of 55. Of the three sheltered schemes for redevelopment, two will become Older People's Villages offering a range of housing options designed to support a variety of needs within a community setting. One sheltered scheme will become an Extra Care scheme offering residents the benefit of additional support to meet increasing needs.

~~7.4.89~~ In addition, there will be considerable financial investment focused on the remaining twelve sheltered schemes over the next two years. This will enable the Council to improve facilities and services within sheltered schemes, which will support the needs of older people and encourage our residents to remain independent for as long as possible to improve their quality of life and reduce the financial burdens on local health and social care services.

~~7.4.910~~ There is a need for both specialist and long term housing solutions to be found for people with a learning disability, mental health conditions, substance misuse and older looked-after children within Havering. Work is underway to identify the demand for supported housing as part of the Council's housing development programme work.

~~7.4.4011~~ For residents with a special educational need and disability who have reached 16 years of age, the Council is developing an integrated post-16 strategy that will include identifying housing needs and setting out suitable housing options. This will include the development of further supported living schemes and work to ensure that existing housing options are identified, such as the ground floor flats or bungalows that enable individuals to live independently (with appropriate support) in the community.

~~7.4.4412~~ All development proposals for specialist accommodation should meet an identified and up to date local need. It is important that any new provision reflects the requirements of the local community in terms of the type, location and design of accommodation.

7.4.42<sup>13</sup> Specialist housing should be located in areas that have good public transport connections and access to essential services by walking and cycling. This will enable residents to integrate into the local community and avoid social isolation.

7.4.43<sup>14</sup> Careful consideration should be given to the design of specialist accommodation to ensure that it is tailored to the needs of the intended occupants and that it is easily adaptable for future occupants who may have different needs. Residents should have access to high quality and usable outdoor amenity space. In circumstances where the intended occupants are unlikely to use outdoor space, it will still be important for an attractive outlook to be provided which should incorporate soft landscaping.

MM10 Policy 7 **Section 7 : Successful Places to live : 7.5 Residential design and amenity**

Amend / insert additional text in policy criteria v., vi. and viii. as follows :

To ensure a high quality living environment for residents of new developments, the Council will support residential developments that:

- iv. Meet the National Space Standards and the London Plan requirement for floor to ceiling heights;
- v. ~~Adhere to the London Plan policies in regards to 'Lifetime Homes Standards' and 'Lifetime Neighbourhoods';~~
- v. Are sited and designed to maximise daylight and sunlight;
- vi. Incorporate an appropriate level of high quality, usable green infrastructure and amenity space that is designed to be multi-functional and offer a range of environmental benefits and leisure and recreation opportunities;
- vii. Provide both balconies and communal amenity space in flatted schemes; and
- viii. Maximises the provision of ~~Provide~~ dual aspect accommodation unless exceptional circumstances are demonstrated;

Proposed modifications to explanatory text :

Delete paragraph 7.5.3 from the explanatory text and renumber following paragraph as follows :

~~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.~~

7.5.4<sup>3</sup> 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.

Add a new paragraph 7.5.4 to the explanatory text as follows:

No Likely Significant Effect – this change would be positive for European sites and strengthen their protection

7.5.4 New development in Havering should be of a high quality and offer a good quality living environment for residents. Dual aspect accommodation offers a range of benefits such as better daylight, a greater chance of direct sunlight for longer periods, natural cross ventilation, mitigating pollution, offering a choice of views, greater flexibility and adaptability. In line with the Mayor's Housing SPG 2016 developments should minimise the number of single aspect dwellings. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.

Amend the start of paragraph 7.5.5 of the explanatory text as follows :

7.5.5 High quality green infrastructure and 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.

MM11 Policy 10 **Section 7 : Successful Places to live : 7.8 Garden and Backland Development**

Insert additional criterion v. in the policy and renumber final criterion as vi as follows :

Proposals for residential development on garden and backland sites in Havering will be supported when they:

- i. Ensure good access and, where possible, retain existing through routes;
- ii. Retain and provide adequate amenity space for existing and new dwellings;
- iii. Do not have a significant adverse impact on the amenity of existing and new occupants;
- iv. Do not prejudice the future development of neighbouring sites; ~~and~~
- v. Do not result in significant adverse impacts on green infrastructure and biodiversity that cannot be effectively mitigated and;

~~→ vi.~~ Within the Hall Lane and Emerson Park Character Areas as designated on the Proposals Map, the subdivision of plots and garden development will not be supported , unless it can be robustly demonstrated that the proposal would not have an adverse impact on the character of the area and that the proposed plot sizes are consistent with the size, setting and arrangement of properties in the surrounding area.

MM12 Policy 11 Delete the existing Policy as follows:

**Gypsy and Traveller accommodation**

~~The Council will meet the identified current and future accommodation needs of Gypsies and Travellers and Travelling Showpeople in Havering by:~~

- ~~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~~

No Likely Significant Effect – there are no linking impact pathways between growth in Havering and European sites.

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites since the HRA of the submitted Local Plan confirmed there were no significant impact pathways linking growth in Havering to European sites.

- ii. ~~Retaining and protecting the existing Travelling Showpeople plot at Fairoaks, St Marys Lane.~~

~~Proposals brought forward for permanent Gypsy and Traveller pitches on the sites identified on the Proposals Map will be required to demonstrate:~~

- iii. ~~A suitable layout of the site;~~
- iv. ~~That the site has essential services such as water, power, sewerage, drainage and waste disposal;~~
- v. ~~High quality boundary treatment and landscaping of the site; and~~
- vi. ~~The removal of ancillary equipment and structures not part of the residential accommodation.~~

~~Development of any additional permanent or temporary Gypsy and Traveller pitches must meet an up to date and evidenced need and will be determined in accordance with the National Planning Policy for Traveller Sites. Proposals must also satisfy the criteria below in addition to criteria iii-vi above:~~

- vii. ~~The site has safe and convenient access to the highway and public transport services;~~
- viii. ~~There is provision within the site for parking, turning and servicing;~~
- ix. ~~The site has reasonable access to local services and community facilities such as healthcare, schools and shops;~~
- x. ~~The proposal would not result in significant adverse impacts on the amenity of occupiers of neighbouring sites;~~
- xi. ~~The proposal would not result in significant adverse impacts on the visual amenity of the local area; and~~
- xii. ~~Sites at risk of flooding should be subject to the sequential and exception tests.~~

~~7.9.1 The Havering Gypsy and Traveller Accommodation Assessment (GTAA) 2017 provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpersons accommodation in the borough up to 2031. The Assessment identifies a need for 33 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 33 pitches needed, 26 pitches are required within the first 5 year period of the Plan (2016 – 2021), and the remaining 7 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15 year plan period (2016-2031).~~

~~7.9.2 The GTAA demonstrates that all Gypsy and Traveller families living in the borough currently occupy private sites within the Green Belt. There are no public sites within the borough. The biggest constraint when trying to identify suitable land to meet the need for Gypsy and Traveller pitches in Havering is the Green Belt.~~

~~7.9.3 In accordance with National Planning Policy, Gypsy and Traveller pitches are inappropriate development in the Green Belt and can only be permitted in very special circumstances. However, the Council has not been able to identify any suitable and deliverable land within the built-up area that could be used for the Gypsy and Traveller accommodation.~~

~~7.9.4 Policy 11 therefore seeks to meet the need identified in the GTAA through the allocation and intensification of sites within the Green Belt.~~

~~7.9.5 The sites are identified on the Proposals Map and are listed below. In order to provide firm controls and prevent further intensification, a maximum number of pitches will be permitted on each site as set out below:~~

- ~~● Tyas Stud Farm rear of Latchford Farm – maximum of 5 pitches~~
- ~~● Vinegar Hill – maximum of 4 pitches~~
- ~~● Hogbar Farm West – maximum of 3 pitches~~
- ~~● Ashlea View, Tomkyns Lane – maximum of 2 pitches~~
- ~~● Benskins Lane – maximum of 10 pitches~~
- ~~● Fairhill Rise – maximum of 2 pitches~~
- ~~● Hogbar Farm East – maximum of 7 pitches~~
- ~~● Lower Bedfords Road – maximum 1 pitch~~
- ~~● The Caravan Park, Putwell Bridge – maximum of 2 pitches~~

~~7.9.6 The sites are all currently in Gypsy and Traveller use and they have all been identified within the GTAA as contributing to the overall need for pitches in line with the definition of Gypsies and Travellers in the Planning Policy for Traveller sites 2012. The maximum number of pitches on each site takes into account the need arising from each site as identified in the GTAA and an understanding of what facilities and space a pitch typically requires. Further details are set out in the Gypsy and Traveller Position Statement that supports this Local Plan~~

~~7.9.7 The GTAA also identified need for up to 29 additional pitches for “unknown households”, that is, households whose travelling status was not able to be determined through the assessment. These households either refused to be interviewed, or were not on site at the time of fieldwork. It is not possible to identify sites to meet an unknown need.~~

~~7.9.8 Where further sites are proposed the Council will ensure that they are required to meet legitimate additional borough need. When considering applications for Gypsy and Traveller sites and Travelling Showpersons plots, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of National Policy.~~

~~7.9.9 In general, proposals for Gypsy and Traveller sites and Travelling Showpersons plots are inappropriate development in the Green Belt and any additional sites will only be approved when very special circumstances have been demonstrated in line with National Policy.~~

Insert new policy as follows:

#### **Policy 11 Gypsy and Traveller accommodation**

The Council will seek to ensure that the accommodation needs of Gypsies, Travellers and Travelling Showpeople who meet the planning definition of a traveller and those who do not meet the planning definition (as set out in Planning Policy for Traveller Sites (2015)) are met for the Local Plan period 2016-2031.

##### **(1) Identifying and addressing accommodation needs**

###### **a) Overall accommodation needs for Gypsy and Traveller and Travelling Showpeople households**

The Council has undertaken a Gypsy and Traveller Accommodation Assessment (GTAA). The Update report (July 2019) of the GTAA identifies this need as 220 pitches for Gypsies and Travellers and 5 plots for Travelling Showpeople for the Plan period 2016-2031 comprised of:

- 174 pitches for Gypsy and Traveller households who meet the planning definition
- 43 pitches for Gypsy and Traveller households who do not meet the definition
- 3 pitches for undetermined households
- 5 plots for Travelling Showpeople who meet the planning definition

###### **b) Accommodation needs for Gypsy and Traveller and Travelling Showpeople households for 2016-2021**

The GTAA Update report (July 2019) identifies the need for pitches and plots for Gypsies and Travellers and Travelling Showpeople for the period 2016-2021 as:

- 136 pitches for Gypsy and Traveller households who meet the planning definition

- 33 pitches for Gypsy and Traveller households who do not meet the definition
- 2 pitches from undetermined Gypsy and Traveller households
- 5 plots for Travelling Showpeople

The sites allocated for Gypsies, Travellers and Travelling Showpeople households are identified on the Proposals Map and listed in the tables in Appendix X. The tables in the appendix identify the number of pitches and plots that will be accommodated on each site.

In total, 162 pitches are identified on these sites for Gypsy and Traveller households and 5 plots for Travelling Showpeople households. The remaining accommodation needs for 2016-2021 for Gypsy and Traveller households of 7 pitches required will be addressed through the consideration of planning applications for pitches within the seven areas indicated below which have been identified for accommodating growth for 2021-2026.

The sites allocated in Appendix X and for accommodating growth (below) are only to be used for accommodation for Gypsies, Travellers and Travelling Showpeople. These sites will be removed from the Green Belt and inset within it.

#### **c) Accommodation needs for Gypsy and Traveller and Travelling Showpeople households for after 2021**

It is unlikely that there will be scope for sites in the urban area to address the accommodation needs of Gypsies, Travellers and Travelling Showpeople in the period after 2021. Following detailed assessment of the sites allocated in this Local Plan, the Council expects that the majority of the accommodation needs arising for the period 2021-2026 could be met within existing sites or within land adjoining them where this is in the control of households on the existing site(s).

The Council expects the accommodation needs of Gypsy and Traveller households arising in the period 2021 - 2026 to be met at the following locations :

- Ashlea View, Tomkyns Lane
- Church Road
- Haunted House Wood
- Laburnham Stables
- The Old Forge, Hubbards Chase
- Tyas Stud Farm
- Willow Tree Lodge

No further need in Havering after 2021 has been identified as necessary for accommodation for Travelling Showpeople households.

#### **d) Accommodation needs for Gypsy and Traveller and Travelling Showpeople households after 2026**

Planning applications for sites to meet future accommodation needs for Gypsies and Travellers and Travelling Showpeople in the latter periods of the Local Plan period (2026-31) as a result of new household formation will be addressed against relevant national policy and the criteria set out below.

Where appropriate, the Council will seek to retain approved sites for Gypsies, Travellers and Travelling Showpeople in the light of the challenges of identifying suitable sites for these communities.

## **(2) Development criteria for sites for Gypsy and Traveller and Travelling Showpeople**

When considering planning applications for sites for Gypsies, Travellers and Travelling Showpeople, the Council will take into account the matters identified in criteria (a) – (e) of paragraph 24 of Planning Policy for Traveller Sites (PPTS) (2015).

Provision for pitches and plots to meet the needs of Gypsies, Travellers and Travelling Showpeople on the identified sites and on new sites will be supported in a planning application where the Council considers that:

- i. The site has a suitable site layout which demonstrates that the site is able to accommodate the number of pitches and plots sought;
- ii. The site has essential services such as water, power, sewerage, drainage and waste disposal or is capable of being provided with these;
- iii. The site is provided with high quality boundary treatment and landscaping in accordance with Policy 27 of this Plan;
- iv. The site has safe access to the highway and public transport services and will not result in unacceptable impact on the capacity and environment of the highway network;
- v. The site does not place an undue pressure on local infrastructure (such as healthcare, schools and shops);
- vi. The proposal would not result in unacceptable adverse impacts on the amenity of other site occupants and the occupiers of neighbouring sites;
- vii. The proposal would not result in unacceptable adverse impacts on the visual amenity of the local area;
- viii. Sites at risk of flooding should be subject to the sequential and exception tests.

In addition, the Council will also give weight to the criteria set out in paragraph 26 of Planning Policy for Traveller Sites (PPTS)(2015) (or any revisions to national planning policy) when assessing proposals for sites for Gypsies, Travellers and Travelling Showpeople.

7.9.1 The Havering Gypsy and Traveller Accommodation Assessment (GTAA) Update Report (July 2019) provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Havering for the plan period 2016-2031. The report identifies additional need for Gypsy and Traveller households by 5 year periods for households who meet the planning definition and those who do not meet the planning definition (as defined in Planning Policy for Traveller Sites (2015)) as well as those households for which need was undetermined. The table below summarises this:



**Table 4**

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

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

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

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

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

7.9.4 The GTAA Update Report (July 2019) is supported by an up to date and detailed Pitch Deliverability Assessment to determine whether the current identified need for pitches could be accommodated within the existing boundaries of established sites. Further work based on this evidence has also encompassed looking at the scope for existing sites to be expanded to accommodate existing and future needs where the households on a site have ownership or control of adjoining land. This work encompassed assessing the capacity of individual sites to accommodate further

accommodation units of the types typically used by Gypsy and Traveller families including park homes, touring caravans and 'day-rooms'. It provided for reasonable separation between units and access arrangements. It did not encompass detailed feasibility studies as to the capability of sites to accommodate further units. In assessing the scope for sites to accommodate current and future accommodation needs of Gypsy and Traveller and Travelling Showpeople households, the Council has been assisted by the close co-operation of many of the households particularly those with larger, extended family groups. Many households indicated their willingness to take a flexible and pragmatic approach to meeting their accommodation needs through a combination of shared static caravans, tourers and dayrooms rather than more formally set out sites with separate pitches. This was because this would provide the opportunity for households to remain together rather than be accommodated on different sites. It is recognised this approach has practical merit in enabling households to remain together in the short term. Regular review and update of the GTAA will be required, and undertaken, to ensure that future accommodation needs are properly identified and that overcrowding of sites is avoided.

7.9.5 The GTAA Update Report (July 2019) identifies that all Gypsy and Traveller families living in Havering currently occupy private sites within the Havering Green Belt. There are no public sites within the borough and there are no sites in the built up area. The biggest constraint when trying to identify suitable land to meet the need for Gypsy and Traveller pitches in Havering is the Green Belt.

7.9.6 National planning policy says that Gypsy and Traveller pitches are inappropriate development in the Green Belt and can only be permitted in very special circumstances. However, despite repeated and extensive efforts, the Council has not been able to identify any suitable and deliverable non-Green Belt land within the built-up area that could be used for Gypsy and Traveller accommodation.

7.9.7 The policy seeks to meet the needs identified in the GTAA Update report (July 2019) through the allocation, regularisation, intensification or appropriate expansion of existing Gypsy and Traveller sites within the Havering Green Belt. This follows the Council's conclusion that exceptional circumstances can be demonstrated from a significant level of need for pitches for Gypsies and Travellers; a lack of any alternative suitable and deliverable non-Green Belt land; and that the allocation, regularisation, intensification or expansion of established sites would cause no further harm to the Green Belt subject to proposals satisfying the criteria in the policy.

7.9.8 Through the preparation of this Local Plan, the Council is removing these sites from the Green Belt and 'insetting' them within it. This is so that planning applications for Gypsy, Traveller and Travelling Showpeople accommodation on these sites do not need to demonstrate very special circumstances to be approved. The Council wishes to make it clear that these alterations to the Green Belt boundary are limited and exceptional in order to meet the specific identified needs for Gypsy, Traveller and Travelling Showpeople sites.

7.9.9 Although the sites allocated in this policy for Gypsy and Traveller and Travelling Showpeople households are removed from the Green Belt, the Council emphasises that the only acceptable use of these sites will be for accommodation for Gypsies, Travellers and Travelling Showpeople.

7.9.10 The Council will expect planning applications to be submitted from the adoption of this Local Plan to 'regularise' these sites. All planning applications for these sites will be assessed against the relevant policies of this Local Plan and Planning Policy for Traveller Sites (2015). Proposals will be expected to provide a satisfactory residential environment for the occupiers on the site.

**(a) Need for pitches for Gypsy and Traveller households who met the planning definition in Planning Policy for Traveller Sites (2015)**

7.9.11 The GTAA Update report (July 2019) identifies a 15-year need for 174 pitches for Gypsy and Traveller households who met the planning definition of a Traveller as set out in the Planning Policy for Traveller Sites (PPTS) (2015).

**Table 5**

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

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

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

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

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

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

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

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

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

**Table 6**

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

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

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

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

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

**(c) Need for pitches from 'undetermined' households**

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

**Table 7**

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

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

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

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

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

7.9.21 In the light of the other land-use priorities in Havering, particularly, the need to provide enough new homes, the Council considers that it may be unlikely that adequate sites will be identified in the built up areas. Notwithstanding that, at this stage, the Council considers that the work it has undertaken to support the preparation of this Local Plan (paragraph 7.9.4) provides it with up to date and robust information about the potential, if necessary, for existing sites to accommodate further growth in either their current form or with modest expansion into adjoining land that is within the control of the households occupying the current sites. The Council considers that in the event that sites in the urban area cannot be identified or would not provide enough capacity then growth in years 6-10 could be located on some of the existing sites in the Green Belt or extensions to them. In coming to this conclusion, the Council has also taken into account that it is likely that there may be changes to the levels of needs arising from the existing households and these will be identified in a future update of the GTAA.

7.9.22 Following detailed work (see paragraph 7.9.4 above), the existing Gypsy and Traveller sites at:

- Ashlea View, Tomkyns Lane
- Church Road
- Haunted House Wood

- Laburnham Stables
- The Old Forge, Hubbards Chase
- Tyas Stud Farm
- Willow Tree Lodge

have been identified to accommodate Gypsy and Traveller household growth in years 6-10 of the Plan period (2021-2026) and those Gypsy and Traveller households whose accommodation needs (identified in the GTAA Update report (July 2019) as 7 pitches) in the first 5 years of the Local Plan period cannot be met on their current unauthorised sites.

7.9.23 When considering planning applications for Gypsy and Traveller pitches, the Council will take into account the policy criteria outlined in Policy 11 in addition to the requirements of national policy.

**(e) Travelling Showpeople in Havering**

7.9.24 As identified above in paragraph 7.9.2, the GTAA Update Report (July 2019) identified that there are 5 Travelling Showpeople households in Havering and all meet the planning definition in national planning policy. The households living on the existing yard stated that they are looking to expand the yard on to adjacent land that they own, and that this will meet all of their current and future needs. The Council envisages that planning applications for the expansion of the Travelling Showpeople site (identified in Appendix X) will be considered favourably subject to the criteria in national policy and this policy being satisfied.

**(f) Transit sites in Havering**

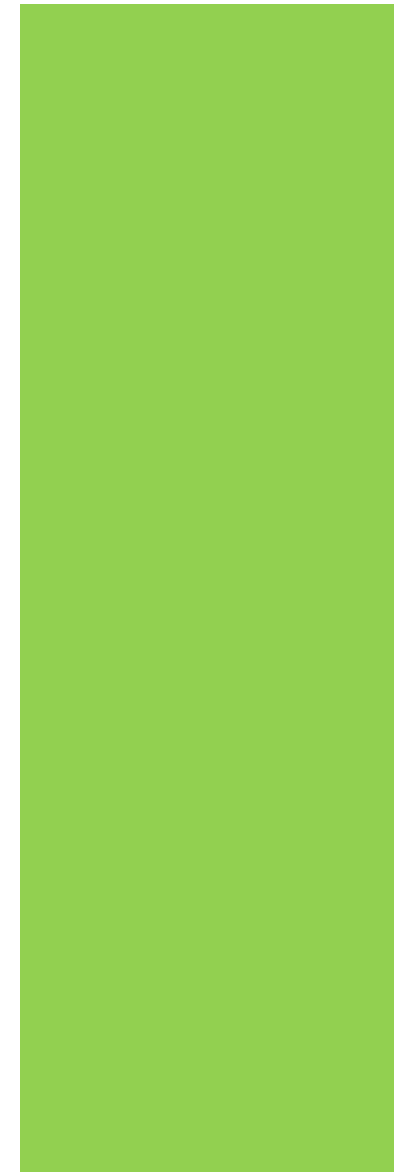
7.9.25 There have been low levels of unauthorised encampments in Havering in recent years. The GTAA Update Report (July 2019) indicates that the majority were short-term visiting family or friends, transient and passing through the borough. Since 2016, there has been an increase in the number of encampments on industrial land that have involved the criminal dumping of waste. It is considered that transit provision would not address any issues related to this activity. Under these circumstances, the Council does not intend to provide any new transit pitches or emergency stopping places. It will monitor the movements of gypsy and travellers into Havering and it will continue to use management arrangements (including enforcement action) for dealing with unauthorised encampments.

**Appendix X**

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

<b><u>Site</u></b>	<b><u>5-Year Need (Meet planning definition) (number of pitches)</u></b>	<b><u>5-Year Need (Do not meet planning definition) (number of pitches)</u></b>	<b><u>Total 5-Year Need (number of pitches)</u></b>

<u>66-72 Lower Bedfords Road</u>	<u>0</u>	<u>3</u>	<u>3</u>
<u>Ashleigh View, Tomkyns Lane</u>	<u>5</u>	<u>0</u>	<u>5</u>
<u>Church Road, Blossom Hill View</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Church Road, Cherry Blossom View</u>	<u>2</u>	<u>0</u>	<u>2</u>
<u>Church Road, Cherry Tree View</u>	<u>3</u>	<u>0</u>	<u>3</u>
<u>Church Road, Dunromin</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Church Road, Meadow Rise</u>	<u>4</u>	<u>0</u>	<u>4</u>
<u>Church Road, Meadow View</u>	<u>3</u>	<u>0</u>	<u>3</u>
<u>Church Road, Paddock View</u>	<u>2</u>	<u>0</u>	<u>2</u>
<u>Church Road, Plot 3</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Church Road, Plot 13</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Church Road, Plot 14</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Church Road, Springfield</u>	<u>2</u>	<u>0</u>	<u>2</u>
<u>Church Road, The Oak View</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Church Road, The Oak</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Church Road, The Schoolhouse</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Church Road, Willow View</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Crow Lane (r/o 21)</u>	<u>2</u>	<u>0</u>	<u>2</u>
<u>Fairhill Rise</u>	<u>3</u>	<u>4</u>	<u>7</u>
<u>Gravel Pit Coppice, Benskins Lane</u>	<u>14</u>	<u>0</u>	<u>14</u>
<u>Haunted House Wood</u>	<u>1</u>	<u>4</u>	<u>5</u>
<u>Hogbar Farm</u>	<u>8</u>	<u>8</u>	<u>16</u>
<u>Hogbar Farm East</u>	<u>10</u>	<u>0</u>	<u>10</u>
<u>Hogbar Farm West</u>	<u>1</u>	<u>6</u>	<u>7</u>
<u>Laburnham Stables</u>	<u>4</u>	<u>0</u>	<u>4</u>
<u>Laburnham Stables</u>	<u>5</u>	<u>0</u>	<u>5</u>
<u>Laburnham Stables</u>	<u>1</u>	<u>0</u>	<u>1</u>
<u>Railway Sidings, North Ockendon</u>	<u>1</u>	<u>0</u>	<u>1</u>



<u>Railway Sidings, North Ockendon</u>	<u>10</u>	<u>2</u>	<u>12</u>
<u>The Caravan Park, Putwell Bridge (The former Brook Street Garage site)</u>	<u>3</u>	<u>2</u>	<u>5</u>
<u>The Grove, Prospect Road</u>	<u>5</u>	<u>0</u>	<u>5</u>
<u>The Old Forge, Hubbards Chase</u>	<u>2</u>	<u>0</u>	<u>2</u>
<u>Tyas Stud Farm</u>	<u>5</u>	<u>0</u>	<u>5</u>
<u>Vinegar Hill</u>	<u>18</u>	<u>4</u>	<u>22</u>
<u>Willow Tree Lodge</u>	<u>6</u>	<u>0</u>	<u>6</u>
<b><u>TOTAL</u></b>	<b><u>129</u></b>	<b><u>33</u></b>	<b><u>162</u></b>

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

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

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

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

MM13 Policy 12 **Section 8 : Thriving communities : 8.1 Healthy Communities**

Amend policy criteria iii. as follows :

The Local Plan will promote health and wellbeing by:

- i. Directing new development to well-connected locations to enable active travel (refer to Policy 3);
- ii. Promoting well designed and safe places (refer to Policy 26);

No Likely Significant Effect – this change reduces the allocation of retail and commercial space within the Local Plan and is therefore not expected to impact European sites.



- iii. Promoting the diversification of uses within town centres and managing the overconcentration of uses that can have a negative health impacts ~~such as betting shops and fast food takeaways~~ (refer to Policy 13);
- iv. Supporting the delivery of essential community services (refer to Policies 16 and 17);
- v. Providing and protecting open space, leisure and recreation facilities (refer to Policy 18);
- vi. Supporting measures to promote walking and cycling (refer to Policy 23);
- vii. Supporting the provision of multifunctional green infrastructure (refer to Policy 29);
- viii. Seeking environmental improvements, minimising exposure to pollutants and improving air quality (refer to Policies 33 and 34); and
- ix. Avoiding contributing to factors that affect climate change, and contribute to prevention measures that militate against the effects of climate change (refer to Policies 32 and 36).

Amend the final paragraph of the policy as follows :

Developers of major development proposals are required to consider wider local/regional primary care and other health strategies, as appropriate, to take into account how any developments can contribute to the aims and objectives of those strategies.

MM14 Policy 13 **Section 8 : Thriving communities : 8.2 Town Centre development**

Para. 8.2.2 Proposed modifications to explanatory text :

Amend / insert additional text within and at the end of paragraph 8.2.2 of the explanatory text as follows :

8.2.2 The Havering Retail and Commercial Leisure Needs Assessment Quantitative Update Addendum (20158) identified a quantitative need for the borough for comparison goods of up to ~~49,500~~20,720 square metres, for convenience goods of up to ~~43,200~~10,851 square metres and for commercial leisure floorspace (A3, A4 and A5 uses) of up to ~~24,000~~10,620 square metres gross by 2031 (see Table 8). The largest proportion of the retail and commercial leisure development will be accommodated within Romford Metropolitan Town Centre, and the remainder spread across the district centres where further scope for development and enhancement has been identified. This extra comparison retail space will not be required until after the Local Plan has been reviewed.

Insert new table as follows :

Table 8

Floor space Needs (Gross) from 2017 -2031 (Comparison, Convenience and Commercial Leisure)

<u>Year</u>	<u>2017</u>	<u>2021</u>	<u>2026</u>	<u>2029</u>	<u>2031</u>

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites

<u>Comparison</u>	<u>-3,724</u>	<u>-3,345</u>	<u>8,179</u>	<u>15,303</u>	<u>20,722</u>
<u>Convenience</u>	<u>8,235</u>	<u>5,822</u>	<u>8,299</u>	<u>9,829</u>	<u>10,851</u>
<u>Commercial Leisure</u>	<u>14</u>	<u>2,426</u>	<u>6,403</u>	<u>8,921</u>	<u>10,619</u>

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

MM15 Policy 15 **Section 8 : Thriving communities : 8.4 Culture and creativity**

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

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

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

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites

MM16 Policy 17 **Section 8 : Thriving communities : 8.6 Education**

Amend criteria vi. of the policy as follows :

Development proposals for nurseries will also be expected to demonstrate that:

- v. They meet the floorspace requirements as set out in the statutory framework for the early years foundation stage;
- vi. Drop offs and pickups can be catered for safely ~~on site~~; and
- vii. There is no significant adverse impact on the amenity of existing residents.

Proposed modifications to explanatory text :

Amend paragraph 8.6.9 of the explanatory text as follows :

Childcare facilities should be safe, accessible for all, and provide both indoor and outdoor learning opportunities. There has been an increase in Havering in planning applications for nurseries in residential areas. Although these proposals can contribute towards meeting a local need, it is important that residential amenity and highway safety are preserved. As nurseries generate significant traffic during peak hours, proposals will be expected to provide sufficient car-parking including pick-up and drop-off points. ~~on site~~.

No Likely Significant Effect – this change applies to grammatical aspects of the plan that are irrelevant to European sites

MM17 Policy 19 **Section 9 : Opportunities to prosper : 9.1 Business Growth**

Amend criteria iv. of the policy as follows :

The Council is committed to building a strong and prosperous economy in Havering and will encourage and promote business growth by:

- i. Protecting designated Strategic Industrial Locations for industrial uses as set out in the London Plan;
- ii. Protecting designated Locally Significant Industrial Sites for B1 (b) (c), B2 and B8 uses;
- iii. Directing office development to Romford Metropolitan Centre and the borough's district centres as part of mixed-use developments;
- iv. Requiring large scale residential proposals within Romford Town Centre to incorporate high quality flexible business space, subject to viability, and progress towards meeting the identified office employment floor space requirement as detailed in Table 10 Local Plan Monitoring Framework, and in consideration of individual site characteristics not comprised in viability assessments such as configuration, servicing requirements and neighbouring uses.
- v. Supporting the development of high quality affordable and flexible business spaces of varied unit sizes to meet the needs of small and medium sized enterprises (SMEs) and start-up businesses (see Policy 21);
- vi. Supporting development proposals that improve the physical appearance, attractiveness and competitiveness of employment areas;
- vii. Supporting the sustainable growth and expansion of business and enterprise in rural areas;
- viii. Supporting the development of a hotel within, or in close proximity, to the Rainham Employment Area to support business growth and opportunities in this area; ~~and~~
- ix. Supporting the London Riverside and the emerging Romford Town Centre Business Improvement Districts;

No likely significant effect – policy does not allocate additional land for industrial or employment uses than has already been assessed in the HRA.

Additional criteria x. and xi. be added to the policy :

- x. Working with the Port of London Authority (PLA) to explore opportunities to improve and develop wharf infrastructure and to explore increasing use of the River Thames for freight transport; and
- xi. Supporting the strategic significant growth potential of the Borough in logistics activities of greater than sub-regional importance, as set out in the London Plan.

The borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs) are shown on the Proposals Map.

Proposed modifications to explanatory text :

Additional text added to the end of paragraph 9.1.4 of the explanatory text as follows :

9.1.4 Strategic Industrial Locations (SILs) are locations identified by the Mayor of London, following assessment of future demand, as London's main reservoir of industrial land. They are identified as vital for providing capacity for activities such as logistics, waste management, utilities, land for transport, and industrial 'services to support the service sector', and they are accorded strategic protection by the Mayor of London and London boroughs. The Locally Strategic Industrial Sites (LSISs) are sites identified by the Council as vital for local industrial functions, including availability of low rent accommodation, which support a range of local employment. The Council nevertheless realise the importance of addressing other strategic and local land-use requirements, in particular the pressing need for new homes. The Council will, therefore, keep under review the need for employment land as part of a managed approach in line with the requirements in the National Planning Policy Framework and the London Plan and with regard to meeting the other objectives of this Local Plan.

9.1.5 The Havering Employment Land Review (ELR) (2015) found that there is a gross demand for 350 hectares of industrial land (B2 and B8 Use Classes) in Havering over the Local Plan period up to 2031/2. It notes that the vast majority of the existing Strategic Industrial Locations (SILs) are located away from residential areas with direct access to the strategic road network. The Locally Significant Industrial Sites (LSISs) are well functioning industrial employment areas with an on-going demand for space to service industrial and logistical occupiers. They are areas that remain the most suitable locations for accommodating Havering's industrial and warehousing demand. The Review also recommends the designation of Freightmaster Estate in Rainham as a Strategic Industrial Location.

Amend paragraph 9.1.6 of the explanatory text as follows :

9.1.6 The ELR advises that ~~49.5 24ha~~ of employment land can be released over the Plan period. ~~Industrial land previously designated for its local significance can be released from industrial employment uses.~~ The previously designated land recommend for release comprises 2.7 ha at Crow Lane (Romford gas works), 15.4 ha at Rainham West and 1.4 ha at Bridge Close, Romford. The de-designation of these sites will facilitate the delivery of new residential developments and make a significant contribution towards meeting the borough's housing need. Safeguarding SILs and the remaining LSISs will ensure that there is sufficient capacity to meet projected demand for industrial land in the borough going forward over the plan period.

MM18 Policy 20 **Section 9 : Opportunities to prosper : 9.2 Loss of Industrial land**

Amend the policy title as follows :

**Loss of industrial land Loss of locally significant industrial sites and non-designated land**

Add a new opening paragraph to the policy as follows :

The Council will keep under review the provision of Locally Significant Industrial Sites (LSISs) and non-designated industrial land as part of its commitment to ensuring that Havering has a strong and prosperous economy.

Delete criteria ii. from the second paragraph (was first paragraph) as follows :

The Council will only support the loss of non-designated industrial land and floorspace in Havering where it can be demonstrated that:

- i. The change of use from industrial employment uses will not lower the industrial capacity of the borough below that necessary to meet projected demand over the planning period as estimated by the most up to date Havering Employment Land Review;
- ii. ~~The existing employment land use causes unacceptable detrimental effects, that cannot be mitigated, on the amenity of nearby residential areas; and~~
- iii. There is no market interest in the site following one year of continuous active marketing.

Add new third and fourth paragraphs to the policy as follows :

In considering proposals for the loss of LSISs and non-designated industrial land, the Council will take into account the wider land-use objectives of the Local Plan because the release of land which is no longer needed for employment use may assist in securing these.

The Council will require the re-provision of non-designated industrial land where it is located within a wider area of commercial uses (such as retail) in the event of proposals being submitted for redevelopment of the wider area except in cases where this policy accepts their loss.

Proposed modifications to explanatory text :

Amend paragraph 9.2.1 of the explanatory text as follows :

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites.

9.2.1 Locally Significant Industrial Sites (LSISs) are of local significance for industry and warehousing. Non-designated industrial land and floorspace comprises land and floor space last used for employment use or land and floorspace which is currently in employment use but does not lie within the area identified and safeguarded as a Strategic Industrial Location (SIL) or a Locally Significant Industrial Site (LSIS).

Delete paragraph 9.2.2 of the explanatory text as follows :

~~9.2.2 The underlying purpose of Policy 20 is to protect and where possible enhance the employment potential of the existing non safeguarded employment land and floorspace. The policy provides some flexibility which aims to recognise individual site characteristics and allow some very limited loss of employment land and floor space where significant unacceptable detrimental effects on amenity of nearby residential uses and no market interest are clearly demonstrated. The policy thrust is therefore to ensure that not too much industrial land and floorspace is released as this could hinder the long term economic prospects of the borough.~~

Add new text as replacement paragraph 9.2.2 of the explanatory text as follows :

9.2.2 In line with the focus on a strong economy in Havering, the purpose of Policy 20 is to protect and where possible enhance the employment potential of the existing Locally Significant Industrial Sites and non-designated employment land and floorspace.

Add a new paragraph 9.2.3 to the explanatory text as follows :

9.2.3 Although the focus of Policy 20 is to seek to protect Locally Significant Industrial Sites and non-designated industrial land, the Council recognise that the policy should provide for some flexibility in the extent to which industrial land is safeguarded. Some scope for flexibility is important because the Council recognises that in Havering there is considerable pressure to accommodate a range of important land uses including housing and infrastructure as well as industrial / employment. In taking this approach, the Council will always carefully consider up to date evidence as to how the proposed change of use from industrial / employment uses will impact on the overall industrial capacity of Havering over the Plan Period. It will also examine information arising from the marketing of the site to ensure that the site / land is genuinely surplus to employment requirements.

Amend paragraph 9.2.3 and renumber as 9.2.4 of the explanatory text as follows :

~~9.2.34~~ As already noted in Policy 19 on Business Growth, the Havering Employment Land Review (ELR) (2015) identified 19.5 hectares of land previously designated for its local significance and an additional 4-5ha from non-designated employment uses to be released over the Plan period making the overall amount of employment land to be released not greater than 24 ha to be released from designated industrial employment use to enable wider regeneration benefits. The ELR further advised that an additional 4 to 5 hectares of employment land could be released from other non-designated sites over the Plan Period, making the overall amount of employment land to be released not greater than 24 hectares. To allow for a loss bigger than the recommended 24 hectares benchmark would undermine Havering's economic development objectives. Companies seeking to expand or start a business in Havering in the future may not have sufficient land or business premises to do so. There are approximately 50 hectares of non-designated industrial sites remaining in the borough. These generally perform well as

employment areas, meeting the needs of local businesses. By resisting further erosion of this type of employment land and floorspace this policy is seeking to maintain business land and spaces for local business.

Renumber paragraphs 9.2.4 and 9.2.5 of the explanatory text as 9.2.5 and 9.2.6 as follows :

9.2.4~~5~~ As part of managing the overall approach of housing delivery in Havering, the Council recognises that there may be locations where the quality of residential environment is being compromised by the operation nearby industrial use, for example due to noise or access issues. In these cases the relocation of that offending industrial activity would be reasonable way forward in mitigating the adverse amenity issues may be acceptable. Every case will be treated on its own merits.

9.2.5~~6~~ To demonstrate a lack of market demand an applicant should submit transparent and robust marketing evidence that the site has been vacant and that a thorough continuous marketing exercise has been undertaken and sustained in the local area for a 12 month period. Marketing must be through a commercial agent that sets out the competitive price that genuinely reflects the market value of the property in relation to its use, condition, quality and location. It must be demonstrated that consideration has been given to alternative layouts and business uses, including smaller premises with short term flexible leases appropriate for SMEs.

Add a new final paragraph 9.2.7 to the explanatory text as follows :

9.2.7 Some non-designated industrial land and floorspace is located within larger sites that include other uses such as retail. The Council recognises that in such cases redevelopment of the overall site may provide an important opportunity to secure a more advantageous distribution and allocation of land uses having regard to factors such as the characteristics of the site and its surroundings. In such cases, the Council will expect the wider redevelopment proposal to make suitable re-provision for the non-designated industrial land where the policy requires that it is retained. Any subsequent proposals for the loss of the non-designated land will be assessed against the policy requirements in order to ensure that there is no incremental loss of industrial land over the Plan Period.

MM19 Policy 21

**Section 9 : Opportunities to prosper : 9.3 Affordable workspace**

Amend the first paragraph of the policy as follows :

The Council will ~~promote opportunities for start-up and small and medium enterprises by expecting major commercial and mixed-use schemes to provide a minimum of 20% of its floorspace as affordable workspace~~ support local micro and small businesses through securing affordable workspace within the boroughs network of town centres, Strategic Industrial Locations and Local Significant Industrial Sites. Major commercial and mixed-use developments should provide a minimum of 10% total gross commercial floorspace as affordable workspace for a minimum of 5 years, subject to viability.

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites.

For the purposes of this Policy affordable workspace is defined as –

A workspace provided where rent and service charges, excluding business support services, are on average at least 10% less than comparable local market rates for the duration of a lease (although it is noted that, for some sectors and locations, much reduced rents may be needed to render them affordable to target occupiers).

Move the final paragraph of the policy to become the second paragraph as follows:

Redevelopment of existing low value employment floorspace, that is reliant on less than market-level rent, will be required to re-provide such floorspace in terms of design, rents and service charges, for existing uses, subject to scheme viability, current lease arrangements and the desire of existing businesses to remain on-site.

Affordable workspace should incorporate flexible design features to provide adaptability for a range of uses and occupants with basic fit-out provided to a level beyond shell and core.

The applicant will be required to demonstrate flexible lease terms for target sectors, and where appropriate make provision for short-term, flexible 'all-in' or 'meanwhile' leases, and/or letting space on a per-desk rather than per sq ft basis with the Workspace Provider. The commercial lease terms to be agreed with the Workspace Provider for target sectors will be secured via legal agreement.

Add a new fifth paragraph to the policy as follows :

The proportion of affordable workspace to be provided within specific schemes will be addressed on a site specific, case-by-case basis, taking into account the viability of the development.

Amend the sixth paragraph (was fourth) of the policy as follows :

Where on-site provision is not possible, financial contributions for equivalent off-site provision will be sought. ~~and the amount must be to the satisfaction of the Council.~~

Add a new seventh paragraph to the policy as follows :



Financial contributions will normally only be agreed in exceptional circumstances when it has not been possible to secure appropriate on-site physical space. The amount secured will be dependent on the outcome of a viability assessment and negotiations with the Council.

Delete the final paragraph of the policy as follows :

~~Redevelopment of existing low value employment floorspace reliant on less than market level rent will be required to re-provide such floorspace suitable, in terms of design, rents and service charges, for existing uses, subject to scheme viability, current lease arrangements and the desire of existing businesses to remain on-site.~~

Proposed modifications to explanatory text :

Add a new opening paragraph 9.3.1 in the explanatory text as follows :

9.3.1 The intention of securing and operating affordable workspace in Havering is to use it as a mechanism to strengthen local growth sectors and enable local people to thrive. Havering's entrepreneurial businesses play an essential role in the local economy. The Council is committed to supporting these organisations and recognises that affordable workspace is a means to do so.

Add a new second paragraph 9.3.2 in the explanatory text as follows:

9.3.2 Flexible workspaces are managed, commercial premises, particularly suitable for small/ start-up businesses and which are divided into a collection of small units help by occupiers on a short-term, easy-in, easy-out basis and with communally-shared services, facilities and support for the entrepreneurial activities of the occupiers. Affordable Workspace means flexible workspace which is let to a Workplace Provider and which will allow for occupation by the end users in one or more sectors on terms:

- substantially below market levels of rents and charges when compared with an equivalent letting of the space and facilities on the open market; and
- at a rate comparable with similar facilities available in Havering or (if sufficient comparator premises do not exist in the borough) across London as a whole; and
- at rates which mean that occupation is feasible to a large number of small/ start-up businesses in the relevant sector(s)

Add new text to the end of paragraph 9.3.3 of the explanatory text :

9.3.4.3 Havering has a high number of micro and small businesses. Havering's Employment Land Review (2015) reported that over 90% of businesses in the borough are micro companies with up to nine employees and a further 7% are small enterprises with between 10 and 49 employees. The ELR found that in the office sector the key gap in provision is in affordable and flexible serviced office

accommodation to meet the needs of small start-up companies, there is also demand for smaller industrial unit space for start-up/young and growing businesses. Increasing provision of affordable workspace through contributions from the applicant, or in new premises can help ensure more small businesses have space to stay in the borough and expand.

~~9.3.2 Many SMEs and start-ups with the potential for financial self-sufficiency seek affordable small offices, studios or workspace with favourable flexible lease or licence conditions but often discover that their particular needs cannot be met by market rent levels. The Council's business survey indicates that the cost of rents and poor availability of suitable premises are main factors in driving businesses out of the borough. The provision and preservation of affordable and suitable workspaces that can easily be sub-divided for different uses will increase the opportunities for small business which are essential to Havering's economic vitality and a catalyst for regeneration.~~

Delete paragraph 9.3.3 of the explanatory text as follows :

~~9.3.3 An affordable workspace is a workspace provided where rent and service charges, excluding business support services, are on average at least 20% less than comparable local market rates for the duration of a lease (although it is noted that, for some sectors and locations, much reduced rents may be needed to render them affordable to target occupiers). While a level of 80% of market rents may be acceptable in some cases, the Council's preference is for a sliding scale of 60% of markets rents from years 1 to 2; 80% from years 3 to 5; and 90% thereafter, subject to negotiation. A sliding scale is preferred as it will allow a larger rent yield during the initial stages of a company's' development which will reduce as a comp may matures and is likely to be able to pay higher rents. This will also enable a seamless transition to market level rent at the end of the period.~~

Add a new text as paragraph 9.3.4 in the explanatory text as follows :

Many small/start-up businesses, with the potential for financial self-sufficiency, have particular needs that often cannot be met by the market, either because affordable rents are unviable for the applicant, or it is below a standard expectation of return. This has been compounded by a significant loss of office floorspace in the borough over the last decade due to particular pressure on the conversion of offices to residential use. The introduction of permitted development rights, which allows office to residential conversion without explicit planning permission means that these losses have been further exacerbated – a trend which is expected to continue. In addition, pressure on providing housing targets in the borough requires the Council to de-designate industrial land, which puts additional pressure on the borough's industrial employment land to provide smaller light industrial units that encourage small/start-ups businesses to provide 'services to support the service sector'.

Delete paragraph 9.3.4 of the explanatory text as follows :

~~9.3.4 Major developments should provide 20% of total gross commercial floor space as affordable workspace for a minimum of 5 years, subject to viability. In a redevelopment scheme, the council will require the re-provision of low value employment floor space reliant on less than market level rent to ensure existing businesses are not displaced.~~

Insert new text in the explanatory text as paragraph 9.3.5 of as follows :

9.3.5 The Council intends to use affordable workspace as a key driver to support a flourishing local economy, and provision and preservation of affordable and suitable workspaces that can easily be sub-divided for different uses will increase the opportunities for small business which are essential to Havering's economic vitality and a catalyst for regeneration. The Council will maintain a record of affordable workspace available to small businesses as part of its commitment to growing the Havering economy.

Add new text as paragraph 9.3.6 in the explanatory text as follows :

9.3.6 Cost and size are the two primary variables to consider in defining affordable workspace, and these are both influenced by the type of workspace to be provided – which in turn is related to the occupant that the space will be marketed towards, usually determined by the economic clusters in the locality.

Insert additional text in the explanatory text and delete existing text as follows :

#### Cost

9.3.7 In this context, 'affordable' would be defined as rent and service charges (excluding business support services) that are either:

- less than 80% than comparable local market rates for a period of 5-years per occupant; or
- a sliding scale of 60% of local market rates from years 1 to 2; and 80% from years 3 to 5.

The Council will also consider alternative suggestions made by developers.

9.3.8 A sliding scale is preferred as it will allow a larger rent relief during the initial stages, which will reduce as a business matures and is likely to be able to pay higher rents. This will also enable a more seamless transition to a market level rent at the end of the lease.

9.3.9 What is defined as 'local market rate' will vary depending on the location and the type of workspace provided. Market rates can rise considerably in a short space of time. For the purpose of this Policy, 'local market rates' will be defined by:

- Use Class comparison

- Having borough comparison or (if sufficient comparator premises do not exist in the borough) across the Thames Gateway corridor

#### Size

9.3.10 An affordable workspace unit may be stand-alone premises or a component of a larger workspace area. To maximise flexibility the Council encourages developments that comprise a large area of floorspace to be managed as a series of smaller 'units'. However, this creates complexity in determining whether a proposal meets policy requirements. Where the micro/small floorspace component is provided as a single floorplate, the applicant must demonstrate that the design of the development is orientated towards the operational needs of small businesses. It is acknowledged that a 'unit' may be a physical entity, or a component of a larger floor area.

#### Type

9.3.11 Local market analysis has identified key growth sectors<sup>2</sup> which the Council seek to strengthen. These include:

- Construction
- Creative & Digital
- Logistics
- Manufacturing, Engineering & Technology
- Medical science & Health/Social Care

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

9.3.13 The type of workspace to be provided will be dependent on a number of factors. Where affordable workspace is being provided, early discussions between the applicant and the Council are essential to:

- determine the size of the affordable element of the workspace;
- decide which industries are suitable to market the workspace too; and
- help partner the applicant with the most appropriate Workspace Provider – to facilitate the design and planned management of the space.

#### Off-Site Provision

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

9.3.14 Where genuinely exceptional circumstances can be demonstrated to the Council that the provision of affordable workspace on-site is either inappropriate, or would have an unacceptable impact on the viability of a scheme, financial contributions will be sought to secure equivalent provision off-site.

9.3.15 Off-site provision will be achieved by the Council through:

- bringing redundant properties into use;
- working in partnership with a stakeholder to secure improvements to existing workspaces, or providing additional workspace; offering alternative interventions/activities that support micro and small businesses such as business support.

9.3.16 The off-site contribution will be negotiated on a case by case, cost per sq ft basis. This will also be dependent on the outcomes of a viability assessment and discussions with the Council.

#### Workspace Provider

~~9.3.5~~ 9.3.17 Where affordable workspace is to be provided it is important that the applicant initiates dialogue with a Workspace Provider, as nominated by or agreed with the Council, early on in the pre-application stage. At the planning application stage an agreed Workspace Provider must be identified, along with a submitted proposal for assessment by the Council which details the agreement with the Workspace Provider for managing the workspace to an agreed specification: detailing the potential management arrangements and rents to be charged for a minimum of 5 years.

9.3.18 Applicants will be required to demonstrate likely lease terms for target sectors, and where appropriate make provision for short-term, flexible 'all-in' and 'meanwhile' leases, and where relevant letting space on a per-desk rather than per-square-foot basis.

~~9.3.6~~ The design of workspace for small and micro enterprises will vary, depending on the end occupier or sector. New business space should be flexible, with good natural light, suitable for subdivision and configuration for new uses and activities. The proposal should incorporate flexible design features to provide adaptability for a range of uses and activities. Basic fit-out should be provided to a level beyond shell and core to include: toilets, super fast broadband connections; shared space for events, good standard of insulation to mitigate any overspill from future alternative uses in the building, grouping of services; plumbing, electrics, cabling, and communications infrastructure; light industrial or maker spaces have physical needs for greater floor-to-ceiling heights and service access to accommodate larger equipment and deliveries.

The design of workspace for small and micro enterprises will vary, depending on the end occupier or sector. In general however, applicants should demonstrate that the workspace incorporates flexible internal arrangements, with good natural light, suitable

subdivision and configuration for new uses and activities. The proposal should incorporate flexible design features to provide adaptability for a range of uses and occupants.

- Basic fit-out should be provided to a level beyond shell and core to include: . super-fast broadband connections; shared space and facilities such as communal breakout space, kitchen areas, toilets, bike storage, etc; good standard of insulation to mitigate any overspill from future alternative uses in the building, grouping of services; plumbing, electrics, cabling, and communications infrastructure; light industrial or maker spaces have physical needs for greater floor-to-ceiling heights and service access to accommodate larger equipment and deliveries.
- On specific projects other issues may need to be considered, such as the co-ordination of fire alarm provision, access control arrangements, landscaping design, and mobile phone signal strength.

A consequential modification is required to Table 10 of the Glossary as follows:

For the purpose of Policy 21, Affordable Workspace means:

Flexible workspace which is let to a Workspace Provider and which will allow for occupation by the end users in one or more sectors on terms:

- substantially below market levels of rents and charges when compared with an equivalent letting of the space and facilities on the open market; and
- at a rate comparable with similar facilities available in Havering or (if sufficient comparator premises do not exist in the borough) across London as a whole; and
- at rates which mean that occupation is feasible to a large number of small/start-up businesses in the relevant sector(s).

For the purpose of Policy 21, Flexible Workspace means:

Managed, commercial premises, particularly suitable for small/start-up businesses and which are divided into a collection of small units held by occupiers on a short-term, easy-in, easy-out basis and with communally-shared services, facilities and support for the entrepreneurial activities of the occupiers.

A workspace provided where rent and service charges, excluding business support services, are on average at least 20% less than comparable local market rates for the duration of a lease (although it is noted that, for some sectors and locations, much reduced rents may be needed to render them affordable to target occupiers)

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MM20 Policy 22 **Section 9 : Opportunities to prosper : 9.4 Skills and training**

Proposed modifications to explanatory text :

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites.

Insert a new final paragraph of explanatory text as follows :

9.4.7 For the purpose of Policy 22 'Local' refers to the location of permanent operation of business or location of resident's home being within the London Borough of Havering

MM21 Policy 23 **Section 10 : 10.1 Transport Connections**

A new criterion to be added to the end of the policy as follows :

xvii. Working with partners including the port of London Authority to explore opportunities for utilising the River Thames for freight and passenger transport to reduce traffic congestion and support local businesses.

No likely significant effect – policy does not allocate additional parking facilities than has already been assessed in the HRA.

FMM22 Policy 24 **Section 10 : Connections : 10.2 Parking provision and design**

Delete the first three paragraphs of the policy as follows :

~~The Council will require all development to provide sufficient parking provision in accordance with the maximum parking standards in the London Plan.~~

~~In areas of the borough that have low public transport accessibility levels (PTAL 0-2), the minimum residential parking standards set out in Table 4 will apply.~~

~~In the most accessible parts of the borough (where a standard in the London Plan of up to 1 space per unit applies) the Council will expect a minimum of 0.5 parking spaces per unit.~~

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

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

**Table 10— Residential Parking Standards**

<b>PTAL</b>	<b>Parking Provision</b>
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No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites

<del>0-2</del>	<del>See Table 10a (below)</del>
<del>3-6</del>	<del>London Plan standards</del>

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

Table 10a Minimum Parking – PTAL 0-1~~2~~\* - Outside of the Opportunity Areas

<u>1 Bedroom</u>	<u>2 bedrooms</u>	<u>3+ bedrooms</u>
<del>Less than 1 parking</del> 0.5 spaces per unit	<del>Less than 1 parking</del> 1 space per unit	Up to 1.5 spaces per unit

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

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

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

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

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



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

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

Parking provision in new shopping and leisure developments should serve the area or centre as a whole. ~~It and~~ should not be reserved solely for use in connection with the development proposed and be provided as short stay parking.

Disabled parking and cycle parking should be located closest to town centres and the entrance to ~~of~~ the facilities and should include provision for long and short stay use.

The Council will support development proposals that provide adequate off street servicing arrangements for commercial vehicles and general servicing.

Proposed modifications to explanatory text :

10.2.1 Car parking for development should aim to strike an appropriate balance between meeting the essential parking needs of the site whilst neither acting as a discouragement to using public transport nor adding to demand for on-street parking. Discussion of the appropriate balance should form a key part of Transport Assessments. Travel Plans should be developed to minimise the need for car-based access. Developments should seek to provide the minimum realistic amount of car parking for the scheme without undue risk of overspill parking onto surrounding streets. The allocation of car parking should consider the needs of disabled people, both in terms of quantity and location.

10.2.2 Developments will be supported that comply with the London Plan parking standards for all other forms of parking including for cycles, motor-cycles, cars for disabled people, electric vehicle charging points and coaches;

Insert a new final sentence in paragraph 10.2.3 of the explanatory text as follows :

10.2.3 The Council's approach to off-street car parking standards is to ensure that parking is not over-provided at destinations served by good public transport (maximum levels of provision), but to recognise and respect the decision many residents make to continue to own a car and ensure that adequate levels of off-street parking are provided in new residential development in areas with lower levels of accessibility to public

transport. The Council considers this is justified and appropriate in Havering because the borough is not well provided with public transport services for some journeys and there are no practical alternatives to making journeys by car.

10.2.4 The London Plan Parking Standards clearly outline the need for more sustainable travel. The parking standards for outer London boroughs allow for additional parking in comparison to central London boroughs. This is determined by the access to public transport, as identified by the TfL's Public Transport Accessibility Levels (PTAL).

Delete paragraph 10.2.5 of the explanatory text and Table 4 as follows :

~~10.2.5 The Council's Residential Car Parking Standards Report (2017) draws together a range of evidence to help inform the car parking standards for Havering. The report demonstrates that a significant proportion of the borough has a PTAL of 0-2 reflecting the lack access to rail or underground stations. Havering also has one of the highest levels of car ownership which is above the average for outer London boroughs. Unsurprisingly, the highest levels of car ownership per household are in the areas with the poorest public transport accessibility. In accordance with the London Plan the Council considers it appropriate to set minimum car parking standards for those areas with the lowest levels of public transport accessibility (see Table 4 below). A lower standard may be appropriate for sites with a PTAL of 2 within the Romford Strategic Development Area where this can be justified on a case by case basis.~~

~~Minimum Parking Standards PTAL 0-2~~

<del>1 bedroom</del>	<del>2 bedrooms</del>	<del>3 bedrooms+</del>
<del>1 parking space per unit</del>	<del>1.5 parking spaces per unit</del>	<del>2 parking spaces per unit</del>

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

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

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

10.2.6 Some areas of the borough (such as central Romford and Upminster) have good or very good access to public transport. In areas well served by public transport and therefore with high PTAL levels, the Council has an obligation under the London Plan to reduce private car use and

provide fewer parking spaces in comparison to other parts of the borough. ~~The Residential Car Parking Standards Report (2017) found that in Havering, even areas with high PTALs can have higher car ownership levels than the outer London average.~~

Delete paragraph 10.2.7 of the explanatory text as follows :

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

Renumber the remaining paragraphs as follows :

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

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

~~10.2.40~~9 The Council will expect parking provision to be provided on site, but it is recognised that this may not always be sufficient. In situations where in-curtilage parking is required, it should be located close to the home to avoid inconvenience and increase natural surveillance. Large, isolated car parks should be avoided. Whilst parking will be provided within private areas, it should be recognised that people will wish to park where they consider convenient and this is often on the existing or proposed street. This should be taken into consideration, and parking designed to be convenient for residents so that streets are not dominated by cars.

~~10.2.44~~10 The design and layout of new residential development should take account of the needs of people wishing to cycle through the provision of safe, accessible and secure cycle parking. Developers should aim to make cycle storage as convenient as access to car parking to encourage cycling as a sustainable mode of transport. New flatted development should provide some space either inside the building in a cycle store-room or provide a separate, secure and accessible bike shed within the overall development.

10.2.4211 To reinforce the need for sufficient off-street parking provision and to encourage occupiers to use the available on-site parking, restrictions to eligibility for on-street parking permits can apply to existing and any future parking restrictions.

10.2.4312 The Council will use informatives and legal agreements to ensure that future occupants are aware they are not entitled to apply for on-street parking permits.

MM23 Policy 28 **Section 11 : High Quality Places : 11.3 Heritage assets**

Amend criteria i., vii. and viii. of the policy as follows :

The Council recognises the significance and value of Havering's heritage assets and will support:

- i. Proposals that seek to ~~sustain or~~ conserve and enhance the significance of heritage assets at risk in the borough;
- ii. The maintenance of up to date Conservation Area Appraisals and Management Plans;
- iii. The identification, and maintenance, of a local list of non-designated heritage assets that meet agreed selection criteria;
- iv. Well designed and high quality development in a Conservation Area, or its setting, which preserves, enhances or better reveals the character and appearance of the area and its significance, and which contributes to local character and distinctiveness, taking into account the Conservation Area Appraisal or Management Plan. Where a building (or other element) detracts from the significance of a Conservation Area, its removal will be supported when acceptable plans for redevelopment have been agreed;
- v. Viable uses, alterations or extensions to a listed building, or development within its setting, which would not be harmful to the significance of the heritage asset, including its historic and architectural interest;
- vi. Well designed and high quality development within a Registered Park or Garden of Historic Interest, Historic Park or Garden of Local Interest, Area of Special Townscape or Landscape Character, or within their setting, which sustains or enhances the significance of the heritage asset, including its special character and important views; and
- ~~vii. Proposals affecting the significance of a heritage asset with archaeological interest, including the contribution to significance made by its setting, where:~~
  - ~~a. The proposals are supported by an appropriate assessment of the asset's significance;~~
  - ~~b. Any harm is minimised, clearly justified and necessary to achieve public benefits that are substantial enough to outweigh loss or harm to the asset's significance; and~~
  - ~~c. The significance of any asset or part of an asset to be lost is recorded and made publicly available.~~Well designed and high quality proposals which would not affect the significance of a heritage asset with archaeological interest, including the contribution made to significance by its setting;
- viii. The maintenance of up to date Archaeological Priority Areas;

Delete the second paragraph of the policy as follows :

~~Substantial harm to, or loss of, a Scheduled Monument or non-designated heritage asset with archaeological interest that is demonstrably of national importance, will only be considered in exceptional circumstances.~~

Add a new final paragraph to the policy as follows :

No Likely Significant Effect – these modifications are positive and does not change previous policy requirements therefore the conclusions of the HRA are considered appropriate.

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.

MM24 Policy 30 **Section 12 : Green Places : 12.2 Nature conservation**

Amend the first sentence of the policy as follows :

The Council will protect and enhance the ~~rich biodiversity and geodiversity~~ borough's natural environment and seek to increase the quantity and quality of biodiversity in Havering by :

Delete criteria i. – v. of the policy as follows :

- ~~i. Protecting Sites of Specific Scientific Interest, Local Nature Reserves and Sites of Importance for~~
- ~~ii. Conserving and, where possible, extending wildlife corridors;~~
- ~~iii. Preserving 'veteran' trees and ancient woodland outside protected areas;~~
- ~~iv. Protecting recognised priority species and habitats; and~~
- ~~v. Supporting development that provides appropriate new biodiversity features on site.~~

Replace deleted criteria (above) with new criteria i. – vi. as follows :

- i. Ensuring developers demonstrate that the impact of proposals on protected sites and species have been fully assessed when development has the potential to impact on such sites or species. Appropriate mitigation and compensation measures will also need to be identified where necessary. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission will normally be refused;
- ii. Not permitting development which would adversely affect the integrity of Specific Scientific Interest, Local Nature Reserves and Sites of Importance for Nature Conservation except for reasons of overriding public interest, or where adequate compensatory measures are provided; If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission will normally be refused;
- iii. Supporting proposals where the primary objective is to conserve or enhance biodiversity;
- iv. Encouraging developments where there are opportunities to incorporate biodiversity in and around the development;
- v. Supporting developments that promote the qualitative enhancement of sites of biodiversity value, (by supporting proposals that improve access, connectivity and the creation of new habitats. Measures include maintaining trees, native vegetation, and improving and restoring open spaces and green infrastructure for the benefit of wildlife;
- vi. Working with partners and local conservation groups to improve conditions for biodiversity in the borough.

No Likely Significant Effect – again, these modifications are positive and does not change previous policy requirements therefore the conclusions of the HRA are considered appropriate.

MM25 Policy 31 **Section 12 : Green Places : 12.3 Rivers and river corridors**

Insert additional text in the second paragraph of the policy as follows :

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.

The Council will seek to enhance the river environment by requiring major developments in close proximity to a river to investigate and, where feasible, secure opportunities to restore and enhance rivers and their corridors in line with the Thames River Basin Management Plan (RBMP).

No Likely Significant Effect – again, these modifications are positive and do not change previous policy requirements therefore the conclusions of the HRA are considered appropriate.

MM26 Policy 36 **Section 12 : Green Places : 12.8 Low carbon design, decentralised energy and renewable energy**

Insert a new fifth paragraph in the policy as follows :

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.

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).

Amend criteria iii. and v. and insert additional criteria vi. in the policy as follows :

iii. There is no unacceptable adverse impact on residential amenity in terms of noise, shadow flicker, vibration and visual dominance;

iv. A noise impact assessment, which considers all relevant National and Local guidance, must be conducted, and identify appropriate noise mitigation measures were required to reduce the impacts on the surrounding occupants; ~~and~~

v. It is in compliance with the NPPE and the Ministerial Written Statement (HCWS42) or subsequent national policy and

vi. There is no unacceptable adverse impact on highway safety on the existing infrastructure or the proposed M25 Junction 28 Improvement Scheme.

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites.

MM27 Policy 38 **Section 13 : Minerals : 13.1 Mineral extraction**

Amend the first sentence of the text in the policy as follows :

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites.

The Council will seek to maintain at least a seven year aggregate land bank, as per ~~the~~ Havering apportionment of at least 1.75 million tons apportionment within the London Plan. In this regard, mineral extraction within Mineral Safeguarding Areas will be supported when proposals in isolation and cumulatively would not unacceptably impact on :

- i..Public health and safety;
- ii. The amenity and quality of life of nearby communities;
- iii. The natural, built and historic environments;
- iv. The efficient and effective operation of the road network, including safety and capacity.

Insert additional text at the start of the second paragraph of the policy as follows :

When necessary, ~~A~~-appropriate mitigation measures, to ensure that criteria i.- iv is complied with will be secured as part of any proposed development by planning condition and/or legal agreement.

Add new text to the end of the third paragraph of the policy as follows :

A Transport Statement or Transport Assessment (as appropriate) will be required with all applications to determine the potential impacts the proposal may have on the road network and ensure reasonable contributions from the developers are received to maintain the roads. Full consideration should be given to the use of the River Thames for the transportation of any materials as part of any submitted transport statement.

MM28 Section 14 **Section 14 : Delivery and Implementation**

Amend paragraph 14.0.17 of the explanatory text as follows :

**Delivering new homes and communities through Havering's Housing Zones**

14.0.17 ~~Major sites in the~~ The Romford Strategic Development Area and the Rainham and Beam Park Strategic Development Area are anticipated to deliver over ~~5,300~~ 6,000 and 3,000 homes, respectively, over the Plan period.

Amend paragraphs 14.0.28 onwards of the explanatory text as follows :

**Monitoring the Local Plan**

No Likely Significant Effect – this change applies to aspects of the plan that are irrelevant to European sites

Insert additional text at the end of paragraph 14.0.28 of the explanatory text as follows :

14.0.28 The Local Plan took account of the best possible evidence and research information available when it was prepared. Whilst this gives a sound basis for the Plan's overall direction and policies, it is acknowledged that over the Plan Period circumstances may change. In this circumstance, the Council may wish to adjust the Plan's direction or policies. In particular, it is recognised that the latter stages of the Local Plan have been prepared concurrently with revisions to the National Planning Policy Framework (2019) by the Government and the Mayor of London preparing a draft new London Plan. Changes in national and Mayoral planning policy will need to be assessed to ensure that Havering's planning policies remain up to date and appropriate for Havering. In the light of these factors, the Council will bring forward an update of the Local Plan immediately after its adoption.

Amend paragraph 14.0.29 of the explanatory text as follows :

14.0.29 Notwithstanding the commitment to an update of the Local Plan, and pending the adoption of a new strategy, the Council will, therefore, monitor the effectiveness of its the Local Plan in delivering its objectives. It will do this by regularly assessing its performance against a series of identified key monitoring indicators. The Council will publish the results of these assessments via its Authority Monitoring Report on an annual basis. The monitoring indicators listed in Table 9-10 of Annex 8 will be used to monitor the delivery of each local plan policy. The indicators have specifically been selected to address every policy as far as possible. The indicators are supported by relevant targets, where appropriate, and the extent to which the Local Plan secures these targets will be an important consideration in determining the Council's approach in its update.

Insert two new paragraphs in the explanatory text as follows :

14.0.30 The Council will review policies where it is clear that targets are not met on a consistent basis over time and / or where they fail to be met by a significant amount when considered individually. The Council recognises that given the focus on providing new homes, the indicators and targets for Places to live are especially important. Policy 3 and the Housing Position Statement: Technical Update (October 2019) outline the Council's approach to maintaining a five year supply of housing land and meeting its housing targets. The Council will also keep under review the accommodation needs of Gypsies and Travellers and Travelling Showpeople by undertaking regular reviews of its Gypsy and Traveller Accommodation Assessment.

14.0.31 In addition, the Government's Housing Delivery Test in the National Planning Policy Framework (2019) sets a minimum threshold for housing delivery over a three year period. If delivery falls below this threshold, the Council will need to produce a Housing Action Plan in line with national guidance. The Housing Action Plan will identify reasons for under-delivery, examine ways to reduce the risk of further under-delivery and set out measures the authority will take to improve delivery.

Renumber and insert additional text at the end of the final paragraph of the explanatory text as follows :

14.0.34~~32~~ 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.

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FMM29 A.8 Various changes to monitoring appendix.  
Monitoring

No Likely Significant Effect – this change applies solely to monitoring and therefore presents no mechanism for an effect on European sites

## 3. Conclusion

- 3.1 Following the examination of the Main Modifications and Further Modifications it can be concluded that they will not lead to likely significant effects on European sites and do not undermine the conclusions of the HRA of the submitted in 2017. This is principally because the HRA of the submitted Local Plan was able to confirm that Havering was sufficiently remote from European sites that no realistic impact pathway existed linking development in Havering to effects on European sites.

