



Havering
LONDON BOROUGH

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Dear Minister

RE: National Planning Policy Framework Consultation

The London Borough of Havering (LBH) welcomes the opportunity to comment on the proposed changes to the National Planning Policy Framework.

LBH's response to the consultation comprises this letter and specific responses to the consultation questions submitted via Citizen Space and enclosed within this letter.

In summary, LBH welcomes and supports the focus on the planning system and the aspirations to take an economic growth focus to address local housing need, to ensure ambitious local plans whilst continuing to support sustainable development.

However, we do have concerns about some of the proposals, particularly the approach to housing targets and the standard methodology.

We are also concerned that there are wider and more complex issues which are impacting on economic growth and housing delivery across the country that are outside the control of local authorities or planning departments. It is important that the Government recognises and takes action to ensure that these issues are addressed so that local authorities can enable much needed economic growth.

The wider economy, viability and the rate at which developers will build out and the availability of skilled workers can all have a significant impact on the delivery of new homes. In Havering, housing targets are not being met and recent housing completions are significantly lower than the level of homes approved, yet there is very little the Council can do to encourage the delivery of approved schemes. In this context, changes to the NPPF must be carefully considered to ensure deliverability is improved and does not result in unwieldy policies that make little difference to the amount of housing built.

Housing targets and standard methodology

LBH strongly objects to both the current and proposed standard methodology for calculating housing need due to its significant overestimation of need. Under the current methodology Havering's housing need is 2,385 per annum. LBH has previously argued

that this is not a robust methodology and over inflates the level of need, particularly because of the urban uplift applied to London and we are therefore pleased to see that this urban uplift is proposed to be removed.

The current consultation on the NPPF proposes an update to the standard methodology which would reduce Havering's figure from 2,385 to 1,922. Whilst it is noted that for Havering (and London as a whole) the proposals reduce the housing need, the methodology is still not considered to be robust and justified.

LBH prepared and published a Local Housing Needs Assessment in 2023 as part of the evidence base for an update to the Havering Local Plan. The assessment is based on a robust and justified methodology and found that there is a need for 29,095 homes over the period 2021 - 2043 (1,322 per annum).

LBH consider that this assessment provides a more realistic and locally justified housing need. Furthermore, the Havering Local Housing Needs Assessment considers the mix of homes that are needed, with the emphasis on the need for larger homes, suitable for families. The proposed standard methodology takes no account of this and would result in fewer suitable homes with development chasing targets rather than delivering the high quality, family homes with 3+ bedrooms that Havering needs.

LBH would urge the government to remove the standard methodology in London and recognise that locally robust evidence should provide the necessary starting point for housing delivery.

Character

The importance of character as a significant element in the design of new development is recognised within the current NPPF, the London Plan, the adopted Havering Local Plan, and the emerging Romford Masterplan Supplementary Planning Document. LBH is committed to ensuring that future development in Havering meets the needs of the local community and protects the existing character of the Borough. LBH has recently undertaken a Character Study which will form an important part of the evidence base for a revised Local Plan. The Character Study clearly evidences that much of the Borough is suburban in nature and is sensitive to increases in density. Local character should remain an important consideration when identifying housing sites and establishing density. LBH strongly opposes the proposal to remove the consideration of character. Uplifts in density that result in taller development wholly out of character with the existing area would be considered inappropriate in Havering.

The flexibility to provide borough wide design codes, to ensure certain key principles are understood by developers, would be helpful. However, Design Codes more focused on specific areas with greater development potential would be positive. Previous guidance for Borough-wide Design Codes were not specific enough and would be resource intensive.

Green belt/Grey belt

LBH consider that the introduction of grey belt and its potential use for new residential and commercial development could (subject to careful definition) enable local authorities to focus on strongly protecting and enhancing the green belt, which reflects the Council's aspirations.

Grey belt also has the potential to help ensure that existing brownfield sites are brought forward at densities that reflect the character of the borough and are not over developed.

The Havering Local Housing Needs Assessment (2023) is based on a robust and justified methodology and has identified the need for a mix of homes that moves away from smaller

units. The overall identified need in Havering is for a greater number of family homes with 3+ bedrooms. The 2021 Census also identified that the number of children aged under 18 has seen an increase of 15.2% greatly outpacing the 4.8% and 3.9% increases in London and England, respectively. Havering now has a higher proportion of children aged 0-17 (22.3%) than 80% of local authorities in England. In light of both the SHMA and census data LBH would like to see the development of good quality, family houses with access to amenity space.

The larger homes are more challenging to build in dense urban areas and the possibility of grey belt to help address this need, along with infrastructure, is supported. The use of grey belt may help to address the considerable development pressures where the quantum and density of development is already challenging.

The criteria for “grey belt” and when it can be considered for redevelopment does need to be tightly defined and should respect the importance of retaining a green belt and the reasons for its initial designation. Without tight definition the introduction of this grey belt is likely to lead to a significant increase in speculative planning applications for inappropriate sites in LB Havering which are resource intensive.

LBH would urge the government to carefully consider the definition of grey belt and previously developed land. Consideration could be given to landfill sites and areas with hardstanding, however this may not be appropriate in all areas. Local authorities are best placed to be able to determine the grey belt within their borough and scope should be given within the NPPF in this regard.

LBH fully supports the requirements that any major development in the grey belt will contribute to the number of affordable homes, improvement to local infrastructure, the provision of new, or improvements to existing public green spaces with consideration of Natural England standards.

However, LBH objects to the proposal to support the release of land outside the local plan making process that relates to housing delivery of less than 75% against the housing delivery test or a lack of five year land supply. This proposal does not consider local issues for the lower delivery of land, or where permissions have continually been high but developers have not yet built out the permissions. These proposals will result in piecemeal development and reduce the impetus for the development of urban sites and would result in urban sprawl that does not protect the green belt.

Affordable housing

LBH supports the Government's view that local areas are best placed to decide the right mix of affordable housing for their communities and that tightly defined prescriptive requirements relating to home ownership products should be removed.

Local evidence in Havering shows a need for genuinely affordable rent. The recent increase in the demand for temporary accommodation has far exceeded the local authority budget. Current affordable home ownership products are beyond the reach of most households in temporary accommodation. The financial exclusion experienced by many of the people on low incomes and on benefits means they are not able to take advantage of home ownership products because they will not be able to access mortgages.

LBH does not support the continuation of First Homes, it does not meet need and is bureaucratic to deliver, with high long term costs to administer which are excluded from funding burden considerations.

LBH is supportive of a mix affordable products including both social rent and affordable home ownership and welcomes the flexibility provided by the proposed changes to the NPPF

Transitional arrangements

LBH supports the proposed transitional arrangements that local plans at regulation 19 stage one month after the revised framework is published continue to be assessed under the current NPPF, while those at earlier stages are assessed against the revised NPPF. LBH urges the government to set out a timeframe for the publication of the new NPPF to enable authorities to take this into account in their Local Plan programmes.

Digital Infrastructure

LBH is committed to securing economic growth and inward investment. LBH welcomes the recognition within the draft NPPF of the importance of data-driven, creative and high technology industries. In particular, LBH supports the Government's explicit recognition of the need for facilities and infrastructure to support the growth of these industries, including data centres and grid connections. The NPPF should recognise the locational constraints around the delivery of such infrastructure and in this context it is important that the NPPF continues to allow development within the green belt where very special circumstances can be robustly evidenced.

Havering Local Planning Authority is currently considering a draft Local Development Order, which if approved could bring forward a 400,000sqm data centre campus and a 105 hectare ecology park. This proposal aligns with LBH's and the Government's economic growth and investment aspirations and could offer significant economic benefits and employment opportunities.

Planning fees

Local Planning Authorities are critically under resourced. LBH strongly supports increased fees for planning applications. The Council welcomes the Government's proposal to increase householder fees to meet cost recovery. Cost recovery will vary from authority to authority depending on a number of factors including the cost of officers and accommodation which varies from region to region. For a London authority like Havering, cost recovery would be in the region of £500-600 based on an average application.

LBH urges the government consider setting fees that are regionally appropriate reflecting that there are higher costs in some parts of the county such as London. This would enable local authorities to better resource their development management services. We also support the proposals that fees could be increased beyond cost recovery to create extra funds to cover other underfunded areas of planning such as planning enforcement and monitoring of planning conditions. This is critically important given the financial pressures on local authorities and the need to be able to provide an efficient and effective planning service which the public has confidence in and the Government's aspirations.

The council also urges the Government to increase fees for;

- Material Changes of Use of Buildings/Land
- Prior Approval (Part 16 – Telecommunications)
- Outline and Reserved Matters Applications (needs to reflect the quantum of development being sought and reserved matters can be a lower per dwelling/floorspace fee)

- S73 Applications (needs to reflect the size of the development, and if the development granted planning permission has not been commenced)

These overarching comments should be read in conjunction with LBH's responses to the individual consultation questions enclosed with this letter.

Yours faithfully

Helen Oakerbee

Director of Planning and Public Protection

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