

Notice of Non-Key Executive Decision

Subject Heading:	Towards a new London Plan Consultation Response
Decision Maker:	Helen Oakerbee, Director Planning and Public Protection
Cabinet Member:	Cllr Graham Williamson
ELT Lead:	Helen Oakerbee, Director Planning and Public Protection
Report Author and contact details:	Jill Warren Deputy Team Leader, Development Planning Jill.warren@havering.gov.uk 01708 434461
Policy context:	NPPF 2024 Localism Act 2011 The London Plan 2021 Havering Local Plan 2016-2031
Financial summary:	There are no financial implications arising from this decision.
Relevant Overview & Scrutiny Sub Committee:	Places
Is this decision exempt from being called-in?	The decision will be exempt from call in as it is a Non key Decision

Non-key Executive Decision

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

People - Things that matter for residents X

Place - A great place to live, work and enjoy X

Resources - A well run Council that delivers for People and Place X

Part A – Report seeking decision

DETAIL OF THE DECISION REQUESTED AND RECOMMENDED ACTION

To formally respond to the Mayor of London on the Towards a new London Plan consultation.

AUTHORITY UNDER WHICH DECISION IS MADE

2. Planning

2.1 To exercise all powers and functions on behalf of the Council and to meet all obligations imposed upon the Council pursuant to any planning legislation, except where such powers, functions and obligations are reserved to the Council or its committees.

STATEMENT OF THE REASONS FOR THE DECISION

Introduction

1. The London Plan 2021 is the strategic, spatial plan for Greater London and is part of the Development Plan for Havering. It includes policies on housing and growth, employment, public transport and open spaces. The Mayor of London is required to produce an up to date London Plan every 5 years and is now working on the next London Plan. The new London Plan will cover the period from 2027 to 2050.
2. Towards a new London Plan was launched on 9 May 2025 for consultation. The document is a high level consideration of a range of policy areas. The consultation closes on Sunday 22 June.
3. This report sets out a proposed response to the consultation comprising of a letter summarising key concerns to the proposals (Appendix A) and specific answers to the consultation questions (Appendix B).

Increasing London's housing supply

Housing

4. Housing targets set out in the new London Plan will apply from 2026-27 for 10 years. Towards a new London Plan proposes significantly increasing the current housing target for the whole of London for this period from 522,870 to 879,920. The new Plan will apportion targets for individual boroughs but these have not been set out in the consultation document.

Development in the Green Belt

5. The GLA has commissioned a London-wide Green Belt review and this will include identifying 'grey belt' land across London. The consultation document has not provided any details on the areas being considered for strategic, large-scale urban extensions or where the transport interventions are being considered. The Council is undertaking its own Green Belt study for evidence for the Local Plan and will engage with the GLA as they progress with their evidence base.

Planning for affordable homes

6. Towards a new London Plan continues to support planning for affordable homes and will review threshold requirements to ensure they support affordable housing needs and delivery. The document proposes identifying types of development where affordable housing is difficult to achieve and where the threshold of 10 units may have negative impacts on delivery.
7. The consultation document recognises that the greatest affordable housing need is for social rent homes and proposes exploring options such as specific targets for social rent and increasing the proportion of social rented homes.

Gypsies, Travellers and Travelling show people

8. The adopted London Plan does not set targets for individual boroughs for permanent pitches and plots for Gypsies, Travellers and Travelling show people. The consultation document suggests that the new London Plan sets these targets in order to achieve better provision across London.
9. The consultation document also proposes requiring boroughs to consider granting permanent permission for suitable sites that have temporary planning permission and a London wide target for transit pitches.

Growing London's economy

Digital infrastructure

10. The consultation document recognises the importance of datacentres, and aligns with the NPPF on the importance of significant infrastructure such as this. The Council is currently working on a Local Development Order for a datacentre campus in North Ockendon. If a LDO is progressed, the datacentre would be the biggest in Europe and be of national significance.

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Culture

11. Culture and the creative industries contribute significantly to London's economy and employment. The consultation considers retaining a specific London approach and impacts on design and location of noise-sensitive uses.
12. Havering's Cultural Strategy 'A Good Life' aims to nurture and grow the cultural life of Havering residents. The Council agrees that cultural assets need protection, but more should be done in the London Plan to encourage new cultural spaces and designate areas of underdeveloped cultural ecologies.

London's capacity for growth and design quality

13. The consultation document considers ways of increasing housing supply and types of house builders. It suggests setting building heights that are acceptable in principle in all locations across London that share the same characteristics. It also proposes that the new plan could identify and define tall building clusters.
14. Havering published its own Character Study in 2024 and this provides an analysis of the character and the built typologies across Havering. The study has identified where there are opportunities for densification and for tall buildings. The proposals in the consultation are likely to undermine the approach we have taken to ensure new development respects the character of the existing area.

Homes for families

15. The consultation document recognises that the needs of Londoners of all ages, and through different life stages, should be met. The document makes several proposals including specific requirements for family homes, preventing the loss of family sized homes and adopting a London-wide approach on making higher density areas in London better for children and young people.
16. Family numbers are increasing in Havering and there is a very significant identified need for family housing. The London Plan should strongly support the delivery of family homes in those boroughs that can evidence that there is a significant need.

London's infrastructure, climate change and resilience

Energy efficiency

17. Havering took part in the commissioned evidence base Towards Net Zero (TNZ) to consider the assessment process of energy use of different forms of development. It is understood through the TNZ study that carbon reduction targets based on SAP calculations (that the current London Plan energy targets are based around) may not be the most accurate or effective.

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The Council is supportive of improving the way energy is measured. The current carbon reduction measures are generally well understood, but planners and applicants are less familiar with these alternative methods of measurement.

Waste

18. The new London Plan will update borough-level waste apportionment targets and ensure they align with the latest data and policy reforms.
19. The Council has prepared a response on waste together with Barking and Dagenham, Newham, and Redbridge, who we are working with on the East London Joint Waste Plan. The response focuses on points of disagreement with the current London Plan waste policies and lack of clarity around issues such as sharing surplus capacity, which has come up through production on the Joint Waste Plan.

Next steps

20. Following the consultation on Towards a new London Plan, comments will be reviewed and a draft new London Plan will be published for consultation in 2026. Further evidence base documents are expected to be published during 2025.
21. The indicative timetable for preparing the new London Plan is shown below:
 - Towards a London Plan - consultation 9 May 2025 to 22 June 2025
 - Draft London Plan consultation - 2026
 - Examination process - 2026 – 2027
 - Adoption - 2027

OTHER OPTIONS CONSIDERED AND REJECTED

Do nothing – this option was rejected as there are only limited opportunities for the London Borough of Havering to input into the drafting of the London Plan.

PRE-DECISION CONSULTATION

The consultation response was shared with Councillor Graham Williamson, Lead Member for Regeneration and Cabinet members prior to this decision to publish.

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NAME AND JOB TITLE OF STAFF MEMBER ADVISING THE DECISION-MAKER

Name: Jill Warren

Designation: Deputy Team Leader Development Planning

Signature:

Date:

Part B - Assessment of implications and risks

LEGAL IMPLICATIONS AND RISKS

The London Plan 2021 is the strategic, spatial plan for Greater London and is part of the Development Plan for Havering. The Mayor of London is required to produce an up to date London Plan every 5 years and is now working on the next London Plan.

Towards a new London Plan was launched on 9 May 2025 for consultation. The document is a high level consideration of a range of policy areas. The consultation closes on Sunday 22 June.

There are no legal implications relating to this consultation response.

FINANCIAL IMPLICATIONS AND RISKS

Formally responding to the Mayor of London on the Towards a new London Plan consultation does not give rise to any direct financial risks or implications.

Development Planning will need to ensure that the updated Local Plan is in conformity with the London Plan. Work has begun on the updated Local Plan and will be consulted on in the autumn of 2025, with a view to closely follow the Towards a new London Plan programme.

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

The recommendations made in this report do not give rise to any identifiable HR risks or implications that would affect either the Council or its workforce.

EQUALITIES AND SOCIAL INCLUSION IMPLICATIONS AND RISKS

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

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

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

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

An EqHIA (Equality and Health Impact Assessment) is usually carried out and on this occasion, this is not required.

The Council seeks to ensure equality, inclusion, and dignity for all in all situations.

There are no equalities and social inclusion implications and risks associated with this decision.

ENVIRONMENTAL AND CLIMATE CHANGE IMPLICATIONS AND RISKS

There are no environmental or climate change implications from this decision.

BACKGROUND PAPERS

None

APPENDICES

Appendix A	Response Letter	Open
Appendix B	London Borough of Havering Towards a new London Plan consultation response	Open

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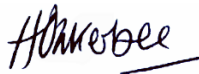
Part C – Record of decision

I have made this executive decision in accordance with authority delegated to me by the Leader of the Council and in compliance with the requirements of the Constitution.

Decision

Proposal agreed

Details of decision maker



Signed: Helen Oakerbee, Director of Planning and Public Protection.

Date: 20 June 2025

Lodging this notice

The signed decision notice must be delivered to Committee Services, in the Town Hall.

For use by Committee Administration

This notice was lodged with me on _____

Signed _____