

London Borough of Havering

Towards a new London Plan consultation response

Increasing London's Housing supply (2)

Opportunity Areas (2.3)

The adopted Havering Local Plan and the Romford Town Centre Masterplan Supplementary Planning Document (2025) have confirmed the *adopted* boundary of the Romford Strategic Development Area (SDA). The Romford Opportunity Area still has the potential to deliver a substantial amount of development to provide homes and jobs, as detailed within the LBH Romford Town Centre Masterplan SPD. LBH continue to support Romford Town Centre as being an Opportunity Area which can help highlight and facilitate the inward investment needed.

Housing (2.7-2.9)

Havering currently has an annual housing target set by the London Plan of 1,285 to 2029.

Updates to national planning policy have reassessed housing targets using a new standard method, and it is this new method that the London Plan proposes to take its housing targets from to apportion out to the individual boroughs. Across London this will mean a significant increase in housing need, from 522,870 to 879,920.

LBH is an outer London borough, with 50% of it being designated as Green Belt. We are strongly opposed to being used to meet the wider housing requirement across London, as it is contrary to the evidence base which assesses actual need and the character of the borough, particularly within the Havering evidence of identified need for more homes suitable for families.

LBH welcomes the acknowledgement that higher rates of housebuilding are limited by factors including rising construction costs, interest rates, suitable supportive funding, and uncertainties over new safety regulation. LBH has granted planning permission for a number of sites that have not been delivered. Councils currently have no power to ensure that new consented homes are built.

LBH further supports the contention that higher rates of housebuilding also depend on funding for vital transport improvement to unlock additional capacity for these homes (reliant upon GLA and Dept. of Transport renewal). LBH are fully committed to the delivery of a new station at Beam Park, this will enable development sites to come forward, providing new high quality homes, alongside essential infrastructure.

We support the prioritisation to plan and deliver homes in London's existing urban areas first with the right homes in the right places. However, LBH does not support proposals to have a blanket approach to increasing density. The new London Plan must not prioritise quantum with over-dense development and unsuitable small units, at the expense of suitable homes that consider and address the identified local need.

The London Plan policy should fully acknowledge the local character of the individual boroughs and their neighbourhoods in terms of design and density in particular. The

London Plan should ensure that the policy approach for the delivery of homes at suitable densities, size and location is set at local level, in borough Local Plans.

The considerable difference in the character and existing infrastructure of inner London compared with suburban, outer London is evident within Havering. Local evidence confirms a greater local need for additional houses to address the identified need for young families. This is in the form of 3+ bedroomed properties and relates to both the market housing need in the borough and the affordable housing need as well as addressing the rising temporary accommodation need.

Sources of supply

LBH welcome that there is an acknowledgement of wider and suburban London being different to central, more urban areas and that the potential sources of supply across London could include town centres, underutilised sites and industrial land. LBH is concerned that the identification and allocation of these sites should be taken and implemented through the Local Plan process by the individual boroughs. This will ensure development is suitable for the location, addresses local infrastructure needs, and prevent inappropriate development in unsuitable locations.

Development in Green Belt (2.10)

LBH note that a London-wide green belt review has been commissioned and that “The strategic green belt review will include identifying ‘grey belt’ land across London”. LBH objects to this and considers that the identification of grey belt should be done through the boroughs’ local green belt review process. We are undertaking our own green belt study for evidence for the Local Plan. We are concerned that the GLA’s approach to green belt is still unclear, no details have been provided on the areas being looked at for strategic, large-scale urban extensions in the green belt with 10,000 plus homes or where the transport interventions are being considered. As the GLA evidence progresses, we would welcome continued engagement with the GLA.

Planning for affordable homes (2.13)

We welcome continued support for planning for affordable homes secured through the planning system and those funded through affordable housing grant, by councils or by housing associations. We note the acknowledgment that the greatest affordable housing need is social rent and that this is currently supported by GLA grant process, which must consider the cost of development to ensure viability. However, the current GLA grant programme is linked to development with higher densities which affects the affordability of the scheme itself. The proposal to set London-wide thresholds is welcomed but policy must consider the variation of embedded land values across London. We acknowledge the complexity of the development of policy and would encourage further dialogue with the boroughs on these issues in particular.

Homelessness is a particular issue in Havering, temporary accommodation need has increased and addressing need for temporary accommodation is very costly. The planning target-based system focuses on the delivery of any residential unit to address housing targets, rather than the appropriate size of those units. The need in Havering is 85% for families with children (85% of need is for 3 bed +). Vulnerable adults who need supported accommodation make up most of the remaining 15%. Rents have risen by 10% in LBH in the last 12 months. (ONS 2025 housing data). Havering has been proactively

finding solutions and is proposing the use of modular units within the borough. We are actively lobbying London Councils for support to propose modular accommodation as Permitted Development.

Other housing option (2.16)

Co-living: Non-student forms of co-living are of concern, as they do not meet the identified housing need within Havering and may result in an excess provision of this form of accommodation. In turn, this could result in higher private renting costs. The Havering evidence confirms little need for this form of accommodation in the borough. (Havering SHMA, 2023).

Houses of Multiple Occupancy (HMO) require licensing. LBH is proactively consulting on the renewal and extension of its current HMO licensing scheme to improve the condition and quality of properties in this sector, whilst addressing potential impacts of over concentration of this type of housing through the planning system. Supported accommodation service providers and managers require registration with OFSTED. A register for the private rented sector is proposed in Renters Rights Bill, the bureaucracy may reduce the number of these in the long run, particularly if the associated costs rise. We have concerns that the interaction of the bureaucracy of the different regimes may cause impacts in the longer term but it is difficult to predict what these might be. The current uncertainty of the various regimes could affect built out rates, with increase costs and result in land banking until there is greater certainty.

Specialist and Supported Housing

Havering notes that more flexible housing stock suitable for a wider range of people's needs and changing household circumstances continues to be an ambition and that more specialist and/or supported provision is needed. It is noted that the provision of specialist housing can free up family housing for younger families. LBH have proactively considered specialist housing at a local level through the evidence base for the local plan. Local Plans are best placed to provide policy for the form and levels of supported housing.

Gypsies, Travellers and Travelling Showpeople (2.19)

The consultation document states that the number of new pitches falls far short of what is needed. Whilst this may be the case across London, Havering's adopted Local Plan included the allocation of 220 pitches (private) for Gypsy and Traveller households and 5 plots for Travelling Showpeople in line with the interview-based evidence base (Havering Gypsy and Traveller Accommodation Assessment, 2019, published). The Council has commissioned an update to this evidence base to inform the next Havering Local Plan. Again, this will be based on interviews and research to ensure accurate information on the borough's accommodation need.

Havering is strongly opposed to the GLA publishing targets for the boroughs for permanent pitches or plots; or being required to make temporary pitches permanent. The allocation of sites and number of pitches should reflect and meet the identified and assessed local, borough-level accommodation need and should continue with the individual boroughs.

Transit provision can take the form of negotiated stopping or transit sites or a combination of both. Havering disagree to the proposal for a London-wide target for transit pitches and provision for negotiated stopping arrangements, or "meanwhile sites". Boroughs should

continue to be responsible for the consideration of the need for transit site allocation without a London-wide target. The consideration of provision of negotiated stopping arrangements should continue with the boroughs and it would be more appropriate for the GLA to support best practice with guidance and sample agreements.

The GLA has commissioned a Gypsy and Traveller Accommodation Needs Assessment. Havering notes that it has still not been published and is awaiting a date for an all borough briefing ahead of publication. Havering maintain its objection to the methodology and conclusions but is keen to continue to engage on this matter.

Growing London's economy (3)

Town Centres (3.3)

LBH is concerned that an overarching approach to allow any commercial and other appropriate development in any strategic town centre (international to district) would put high streets and town centres at risk. While in some cases a flexible approach may be beneficial, e.g. allowing office headquarters outside of town centres, a blanket approach isn't an appropriate way to address these challenges. We fully recognise that our town centres are evolving and facing new challenges and pressures and it is vital that we explore innovative policy interventions, but this must be done locally where there is knowledge and understanding of the specific town centres. In some cases this means that protecting their specific uses is even more important.

LBH is committed to supporting the important role of the borough town centres and has recently adopted a Romford Town Centre Masterplan Supplementary Planning Document (Romford Masterplan SPD) which showcases the potential that Romford has to offer. As new homes are brought online the Masterplan factors in the requirements for key public realm interventions, the greening of private and public space, the broadening of the retail and commercial offer to attract growth and investment, along with the consideration of health and wellbeing, public transport enhancement and the promotion of cycling and walking.

As part of our emerging Local Plan we have also undertaken a Retail and Town Centre Study which will help inform our future policy position. LBH support the retention of London Plan conditions to prevent proliferation of businesses associated with negative health impacts (Hot Food Takeaways, gambling venues etc).

LBH is supportive of the proposal to look at policy on meanwhile use or other opportunities to activate the high streets, particularly where these uses can support organisations that can offer access to culture, community value and/or health and wellbeing benefits.

Industrial Land (3.4)

LBH welcomes the acknowledgement that industrial land needs protection and that changes to use classes can reduce the boroughs controls over light industrial use in particular. Havering has commissioned and published an Employment Land Review (ELR 2024) which has recommended continued protection of SIL and LSIS designations, to protect existing industrial land, to improve quality of buildings on site and promote

intensification of underutilized sites; to monitor changes in industrial land to ensure sufficient supply for economic growth; and to aim to provide a range of affordable workspace options to support SMEs and local businesses.

LBH support the ELR 2024 recommendations, and additionally continue to promote improved public transport, walking and cycling access to the existing sites, particularly in the south of the borough. We have concerns that the proposed London-wide increase in industrial use of low quality green belt or grey belt would undermine the viability of suitable existing industrial areas and result in sites with poor non-car access.

Night time economy (3.5)

LBH supports the proposal to further consider the provision of facilities for night workers in relevant areas. This might include amenities such as late-night shops, cafes, toilets, places of shelter and safe routes to public transport connections. The London after dark report outlines the inequalities experienced by night-time workers, some of which also applies to gig-economy workers.

Digital Infrastructure (3.8)

The Council welcomes that the London Plan 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. The Council welcomes that this type of infrastructure is being endorsed at the regional and national level due to the pressing need for this type of infrastructure in London and beyond.

The Council would urge the GLA to make sure approaches to major energy users is addressed at a national level, allowing central government and utility providers to face the identified challenges at a national scale. This would ensure that major energy users feed into long term plans for the electricity network.

Culture (3.6)

Culture is linked to good health, better outcomes, and contributes massively to London's economic and job market. However, people's access to Culture across London varies from borough to borough. More emphasis is needed on increasing access to and participation in Culture in areas that currently lack this. Havering has an underdeveloped cultural ecology but the Council is committed to changing this. 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 to better drive investment and create new cultural hubs.

London's Capacity for Growth and Design Quality (4)

LBH commissioned a Character Study for the borough to support the review of its Local Plan. The study is supported by Policy 26 on Urban Design in the adopted Havering Local Plan and the Characterisation and Growth Strategy London Plan Guidance. The

Character Study was published in 2024 and 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 set out in 4.1 of your document regarding setting building heights across London and a minimum height benchmark for small sites are likely to undermine the approach we have taken to ensure new development respects and fits in with the character of an existing area.

Standardised minimum height benchmarks would be difficult to implement in most suburban locations within Havering. For example, in a location where 1 and 2 storey buildings predominate, a 4 storey development would be very challenging. If implemented, some exceptions to a blanket minimum height benchmark would be needed. Alternatively, a range of benchmarks for different contexts may facilitate a more sensitive and tailored approach.

Small sites in Havering are often at the rear of existing residential and/or retail buildings and the impact of increased heights in these locations has to be considered on a case by case basis. Densification on such sites may be appropriate providing there is sufficient space for amenity, play and biodiversity. However, these become more challenging for developers to provide with the more units that are proposed.

A London-wide small sites guide could be useful. With ongoing financial pressures, individual boroughs often lack resources to take forward specific guidance documents. In this case many issues are common between multiple outer London Boroughs such as Havering, Bexley, Redbridge, Barking & Dagenham etc. All have a lot a similar areas of lower density houses, but this tends to differ quite substantially to inner London Boroughs with more urban conditions. LBH would strongly oppose a small-site design guide being prepared by the GLA in isolation but would welcome the opportunity to collaboratively prepare guidance with other outer London boroughs.

LBH notes the proposal to support the redevelopment of single homes to provide a significantly larger number of homes on the same site, however LBH has a particular lack of family housing, therefore proposals to split larger existing single family houses up into smaller units would not be supported.

Tall buildings (4.2)

Havering's Character Study (2024) has recently defined areas for tall buildings. This was undertaken based on guidance for suitability/sensitivity factors set out in the GLA Characterisation and growth strategy LPG (2023). A key finding from this process was that analysis of opportunities/constraints in plan form alone is often not a sufficient basis from which detailed tall building guidance can be completed, so a more detailed study based on 3D views is preferable where possible. Given the process to identify potential tall building locations is complex and highly sensitive, LBH do not consider that guidance set out at the London Plan level could sufficiently take into account all the local issues and sensitivities.

Supporting a denser London linked to transport connectivity

Supplementary transport guidance could be helpful provide a more well-rounded guidance than PTAL alone. At present there are often 'cliff edge' conditions where PTAL ratings vary quite starkly over a relatively small distances, making guidance on parking in

less well connected areas challenging to consider in assessing planning applications. Currently some applicants do self-assessments of PTAL ratings, so the proposal for a new metric would be supported.

Heritage (4.4)

The Council would welcome a new policy supporting the sensitive adaptation and retrofit of historic buildings that promotes the retention of facade details and retain character. The policy could consider the EPC/ SAP calculations criteria required; guidance on how better to integrate Air Source Heat Pumps (ASHP) into the landscape and / or architectural design.

Havering is currently reviewing three of our Conservation Area Appraisal and Management Plans, and last year updated our Local Heritage List. The Council is committed to promoting Heritage and securing protections locally for our unique historic built environment. The Council understand the want to not duplicate national policies, but promotion and encouragement of heritage in all parts of London is key, including areas that may have more localised heritage assets or be less engaged with heritage as a part of culture (see response to section 3.6 for further thoughts on this).

Havering encourage the GLA to make sure heritage is embedded in all aspects of the London Plan, to ensure that future development is appropriate and takes into account the current character and heritage assets/settings of the area. It is vital that London's existing heritage is protected.

Heat risk, ventilation and overheating 4.6

LBH would support more rather than less guidance or policy in the London Plan on overheating in dense urban environments with the given negative health implications and the increasing threat they will pose into the future, particularly as it is currently lacking at the National Policy level. It should focus on the need to future proof developments in light of estimated changes in temperature in the longer term.

In terms of planning for warmer conditions, LBH would support minimum requirements around provision of natural or other forms of shading in private or public outdoor areas of development, particularly in areas where vulnerable populations are likely to be located (e.g. spaces that children may use to play, beyond just designated playgrounds).

Enforcement of fully/predominantly dual aspect schemes is very challenging in practice, particularly as viability has become a bigger issue. LBH consider that there should be a stronger policy requirement for this. Recent guidance in the Housing Design Standard LPG encourages a greater predominance of partial corner aspect homes which are poorer in terms of passive ventilation / daylight than through-units. A focus on the quality as well as quantity of dual aspect should be a requirement.

The London Plan guidance on avoiding overheating is important and should be strengthened, leaving this to the Building Control stage of development is too late to inform pre-application discussion and risks pulling focus away from this important issue. This will lead to avoidance measures rather than mitigation. Current guidance / reference to CIBSE TM59 etc guidance is very technocratic and difficult to incorporate into pre-application discussions. Simpler, effective guidance on avoiding overheating at the planning stage would be supported. Clearer requirements for passive solar shading devices such as canopies/shutters etc, for example. There should be clearer more

definitive guidance on the need for solar shading on exposed south and western elevations.

Homes for families (4.7)

While children are decreasing in many inner Boroughs, family numbers are increasing in Havering and there is a very significant identified need. It is difficult to encourage developers to deliver family housing instead of smaller 1-2 bed units on most sites. GLA/Government targets and funding models that tend to focus on the number of units (rather than number of people housed, the number bedrooms etc) may be exacerbating this issue. The London Plan should strongly support the delivery of family homes in those boroughs that can evidence that there is a significant need. We accept that this may not apply to all (or even the majority) boroughs, but families living in Havering are disadvantaged by a policy approach that prioritises delivery of units (which tend to be 1 and 2 bed) rather than supporting the delivery of larger homes. We accept that moving forward not all new family homes will be large, detached houses with large gardens and we welcome creative ways of delivering family homes, but the new London Plan should support this and not seek to squeeze families into inappropriate, small apartments.

Space standards and Designing for all (4.8)

LBH is strongly supportive of the Nationally Described Space Standards that sets minimum sizes for the internal space within new homes. LBH has chosen to opt into these in our adopted Local Plan. We support retaining the national standards and the additional requirements for higher ceilings and for minimums of outdoor space provision.

The proposal to continue to reflect the importance of designing new developments that respond to London's diverse population and to set out criteria for design intent or inclusion design guidelines across typical built environment categories (Similar to the LLDC Inclusive Design Standards 2025) is supported. This is also supported at the neighbourhood-wide scale, for the external environment and for both residential and non-residential development, and in relation to the public realm, which may include a provision for audits of public space or community review panels that can produce qualitative data.

London Infrastructure, climate change and resilience (5)

Infrastructure should include access to health provision. Overdevelopment places pressures on already stretched services within Havering including GP's, and hospital capacity.

Energy efficiency standards (5.1)

LBH 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. LBH 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.

Another recommendation from the TNZ report was that if carbon reduction targets (based on SAP) are retained, different building types should have different targets set i.e. it can be more achievable to reduce carbon by greater amounts on residential development than it is on commercial development. Therefore, further guidance on this issue would be welcomed.

LBH is supportive of retaining carbon offset charges. Generally, for residential development we encourage schemes to be more ambitious than the minimum 35% reduction, and often reductions of 50-70% are achievable. Another recommendation of the TNZ report was that a scale could be introduced in the carbon offset charge to incentivise more schemes to get closer to net zero. This would recognise that 100% carbon reduction is often not viable (e.g. increase the charge between 35 – 60% reduction, a lesser charge for 80%+ reduction).

Currently schemes below 10 units do not have obligations for carbon offset charges. This is problematic as it can incentivise developers to bring forward smaller developments. Applying more stringent energy regulations to smaller schemes would be positive.

Heat networks (5.2)

There are currently no existing district level heat networks in Havering. Further guidance around the role of waste heat from major developments with larger scale heat implications would be welcomed in order to address the technical issues surrounding such development. LBH is considering a heat network in association with the proposed East Havering datacentre.

Whole life-cycle carbon (WLC) and Circular Economy (CE) (5.3)

LBH supports the proposal for clearer guidance on WLC and CE. Current guidance has been useful in highlighting the importance of these fields.

Waste (5.4)

Barking & Dagenham, Havering, Newham and Redbridge are currently working together on a new East London Joint Waste Plan. With our recent experience preparing the Waste Plan against the current London Plan policies, we urge the new London Plan to include clearer guidance on sharing surplus waste capacities with boroughs who face a shortfall in capacity. We consider this to be a strategic issue, noting its importance in helping London to achieve net self-sufficiency. There is currently no guidance on how to approach sharing surplus management capacities, and there is clearly a balance to be struck in ensuring that boroughs with surplus can meet their ever-increasing housing needs, while supporting other London boroughs to meet their apportionment targets.

There should be a clear approach to how boroughs request waste capacity from others, and the evidence they have to provide. In the absence of the London Plan currently providing this, the East London boroughs created proposed criteria for assessing surplus capacity requests, published in our Regulation 19 East London Joint Waste Plan Duty to Cooperate Statement of Compliance. It would be more beneficial if the London Plan provided definitive guidance on surplus requests to make sure the assessment is consistent across London and is approached strategically. It should also be made clear how the area with surplus capacity should assess these requests and how requests should be prioritized.

We also encourage the GLA to reconsider the definition of a waste site as “land with planning permission for a waste use or a permit from the Environment Agency for a waste use”. The inclusion of sites that have an EA permit without planning permission undermines the plan-led approach that waste planning should have. It also could be seen to legitimise sites without planning permission that may be poorly located or bad-neighbour uses at present.

When preparing the new London Plan, the East London boroughs also wish to highlight some concerns with the application of the existing London Plan waste policies, which we believe should be addressed through the new plan. In particular, the East London boroughs would urge against policy text that requires the re-provision of compensatory capacity in all circumstances, irrespective of location or quality. Instead, we consider that a strategic approach to site release should be undertaken through the plan-making process, where this is shown not to undermine the achievement of net self-sufficiency.

To apply a rigid requirement to re-provide compensatory capacity in all scenarios may dis-incentivise boroughs from bringing up-to-date plans forward. In East London’s case it has taken several years to reach a point of agreement to progress with the Joint Waste Plan review, and our experience to date suggests that releasing sites through the development management process offers greater flexibility than the plan-making process. Net self-sufficiency targets should also be monitored annually through the new London Plan monitoring framework.

London’s open spaces (5.6)

The recognition of the importance of open spaces and opportunities to designate new open spaces in new development is welcomed. We welcome proposals for a more detailed assessment of green space, to reflect the wider issues which we know impact upon the benefits that these spaces can deliver. The quality of green space in particular has been shown to impact the health and wellbeing benefits that they can provide, making policy to address management of these resources as vital any regarding access.

The question of who will take responsibility for the long term management and associated costs of new open spaces will be crucial to their success, as the Council's parks teams have significantly reduced resources. The contribution of tree lined streets and small green spaces to health, reduction of flood risk and increased biodiversity is important and their designation would help ensure their retention into the future.

Whilst some green infrastructure, such as green road verges, do not provide meaningful open space for people to use, they are important for amenity, reducing surface water runoff, space for tree planting, and where appropriately managed, biodiversity. Protecting such features would help recognise the contributions they make to the public realm, climate change mitigation, human health and ecology.

Green infrastructure and biodiversity (5.7)

A review of the application of the UGF and how it can work with BNG requirements is welcome. The application of the UGF has raised issues that could be resolved through refinements to the London Plan:

1. The UGF targets are treated as the maximum to achieve rather than the minimum in a large number of planning applications.
2. A significant number of applications in the borough are just below the threshold for major applications, thus avoiding the requirement to meet the UGF target.
3. B2 and B8 uses are able to avoid the UGF target completely.
4. The ecological importance of different types of surfaces are not differentiated sufficiently - for example a flower rich surface or a hedge may have very little value for ecology. If additional categories were provided, this could help increase the likelihood of ecologically important surfaces being selected by developers.
5. Consideration of higher targets for development in more suburban parts of the borough may help reduce the loss of green spaces, such as back gardens.

A significant number of planning applications are exempt from the BNG requirement, usually due to the de minimis exemption or the self build exemption. In both cases, the UGF could help mitigate this and increase the ecological value of soft landscaping if it could be extended to minor development and to B2/B8 uses.

The consultation document states that the forthcoming Local Nature Recovery Strategy will help prioritise where greening should be protected. This is welcomed but the review of the London Plan should also take the opportunity to increase the protection of Sites of Importance for Nature Conservation, and habitats and species outside of SINC's, as they are at increased risk of development impacts as economic growth is prioritised and proposed national policy changes will put the mitigation hierarchy at risk.

Air Quality (5.17)

The proposed PM2.5 solutions for the construction industry are encouraged. Generators are discouraged in the Mayor of London's Air Quality Neutral SPD, and advises that they are to be used for life-saving situations only. Requiring construction sites to have mains power connections would alleviate the pollution emitted from generators. The London Plan must also consider stricter requirements for other PM2.5 producing activities on construction sites which cause dust generation. Although an SPD has been published by the Mayor of London dust is still a considerable issue at construction sites.

It is recommended that the London Plan considers only permitting the use of emergency generators for life saving circumstances, for instance hospital, police and fire brigade use. Recently, there has been a rise in planning applications which propose emergency back-up generators for other, non-emergency use. In addition to the air quality implications, the use of generators also have an impact on climate change. All generators require testing, some of which are tested on a monthly basis and such testing emits pollution and carbon emissions.