Havering Local Plan

Focused Review

Soundness Self-Assessment

March 2018

Soundness Self-Assessment Checklist for Havering Borough Council Local Plan Focused Review

This note was prepared by AMEC on behalf of the Planning Advisory Service. It aims to help local authorities prepare their plans in advance of an examination, taking into account the requirements of the National Planning Policy Framework. A separate checklist looks at legal compliance.

In summary – the key requirements of plan preparation are:

Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?

Is the plan justified?

Is it based on robust and credible evidence?

Is it the most appropriate strategy when considered against the alternatives?

Is the document effective?

Is it deliverable?

Is it flexible?

Will it be able to be monitored?

Is it consistent with national policy?

The Tests of Soundness at Examination

The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria.

The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 182): "The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is 'sound' ", namely that it is:

1. Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

This means that the Development Plan Document (DPD) should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF has 12 principles through which it expects sustainable development can be achieved.

2. Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

This means that the DPD should be based on a robust and credible evidence base involving:

- Research/fact finding: the choices made in the plan are backed up by facts.
- Evidence of participation of the local community and others having a stake in the area; and

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

This means the DPD should be deliverable, requiring evidence of:
- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery; Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities.
- The DPD should be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

4. Consistent with national policy: enabling the delivery of sustainable development

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy: www.planningportal.co.uk). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

The following table sets out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared. Please don't assume that you have got to provide all of these, they are just suggestions of what could be relevant. In addition, the Legal Compliance checklist (a separate document, see: www.pas.gov.uk) should be completed to ensure that this aspect is covered.

The Duty to Co-operate will also be assessed as part of the examination process.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Positively Prepared: *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.*		

Vision and Objectives Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve? Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives? Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? Have reasonable alternatives to the **quantum** of development and overall spatial strategy been considered? Are the policies internally consistent? Are there realistic timescales related to the objectives? Does the DPD explain how its key policy Objectives will be achieved?	• Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. • Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. • The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.	**Section 1 introduces the Local Plan document and its function.** **Annexes A.1 and A.2 of the Havering Local Plan provide an overview of the wider policy context in which it sits and has been prepared.** **Sections 2 to 5 and Annex A.3 of the Havering Local Plan set out Havering's Vision, strategic objectives, and spatial strategy.** **Annex A.3 of the Havering Local Plan identifies the Spatial Portrait and key issues affecting the borough, in which priorities have been set out to clearly show what the Havering Local Plan is seeking to achieve.** **Sections 3 to 13 of the Havering Local Plan contain the Strategic objectives of the Havering Local Plan with the policies and their justifications commenting on how they derive from the spatial portrait and vision and how the objectives are consistent with one another.** **Section 3 (and in particular subsections 3.1.1 and 3.2.1 and Table 9 of Annex A.8 Monitoring) of the Havering Local Plan make the links between the policies in the Havering Local Plan and the related objectives as shown in Annex A.8, which demonstrates how policies have been derived and contribute to each of the objectives identified in subsection 3.1.1 .** **The Sustainability Appraisal looked at reasonable**

		alternatives in regard to the overall spatial strategy. **Section 14 Delivery and Implementation and Annex A.8 Monitoring of the Havering Local Plan address delivery, and the means of delivery for key developments through evidenced infrastructure as well as the monitoring of these developments.** **It includes information on how the Council may use its Section 106 monies, ownership of land and Community Infrastructure (CIL) money to help ensure delivery, and how it will use monitoring tool to assist in assessing policy performance.** **Further information on delivery is contained within the Infrastructure Delivery Plan (2018).** **Relevant agencies have confirmed their support for the objectives of the Havering Local Plan and the identified means of delivery.** **The Local Development Scheme (2018) explains the scope and content of each DPD and shows showing how they will combine to provide a coherent planning policy structure for Havering.**
The presumption in favour of sustainable development (NPPF paras 6-17) Plans and decisions need to take local	• An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see 'Section 3 Effective',	**Section 5 Boroughwide Strategy for Growth of the Havering Local Plan gives an overall strategy to deliver 'good growth' in sustainable locations across Havering.**

| circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.

Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

—any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

—specific policies in this Framework indicate development should be restricted. | below).

- An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at.

- Evidence of responding to opportunities for achieving sustainable development in different areas | **The Havering Local Plan has identified and proposes to direct significant proportion of growth and investment to two main Growth Areas focussed on Romford and London Riverside. It identifies these as Strategic Development Areas (Policies 1 and 2, respectively).**

Several evidence base studies establish the development needs of Havering and support the preparation of the Havering Local Plan.

A schedule is attached to this document indicating which items are included in the formal submission of the Havering Local Plan. The schedule includes a comprehensive list of all the evidence base documents prepared.

These include :

- **Outer North East London Strategic Housing Market Assessment (SHMA) and Update (2016)**
- **Havering Retail & Commercial Leisure Needs Assessment (2015) and update document**
- **Havering Employment Land Review (2015) and update document**

The Sustainability Appraisal Report supporting the Havering Local Plan evidences and justifies the overall strategy and the distribution of development. |
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		The Havering Local Plan will be monitored to ensure its effectiveness against a number of indicators through an annual Authority Monitoring Report..
Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.	• A policy or policies which reflect the principles of the presumption in favour of sustainable development	**Each of the Havering Local Plan policies follows reflects the presumption in favour of sustainable development and accord with the principles and policies enshrined in the National Planning Policies Framework.** **The Sustainability Appraisal (2017) demonstrates that the Council's proposed strategy as set out in the Havering Local Plan is considered to be the most sustainable.**
Objectively assessed needs The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues. Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).	• Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. • Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.	**There are background evidence research papers demonstrating requirements based on population forecasts, employment projections and community need. These have informed the preparation of the policies in the Havering Local Plan. They are listed in the attached schedule.** **These include :** • **the Outer North East London Strategic Housing Market Assessment (SHMA) and Update (2016)** • **Havering Retail & Commercial Leisure Needs Assessment (2015) and update**

		document (2018) • **Havering Employment Land Review (2015) and update document (2018)** **The Havering Local Plan sets out a strategy to seek to deliver the planned levels of growth in Havering in a sustainable manner in accordance with the National Planning Policy Framework.** **Policies 1, 2 and 3 of the Havering Local Plan each promote appropriate mixed use development and set out how the Council will make the most effective use of land.** **Several cross boundary strategic issues have been considered as part of the Duty to Co-operate.** **These are detailed within the Council's Duty to Co-operate statement (2018) and the Consultation Statement (2018) accompanying the Havering Local Plan submission as supporting documents.**
NPPF Principles: Delivering sustainable development		
1. **Building a strong, competitive economy (paras 18-22)**		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21)	• Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.	**Section 2 Vision for Havering and Section 3 Strategic Objectives articulate a clear economic vision and strategy for Havering linked to Havering's corporate Vision and the strategic**

		context provided by the London Plan. They positively and proactively encourage sustainable economic development. **The Havering Local Plan (particularly Section 5 Boroughwide Strategy for Growth) gives an overall spatial strategy to how economic growth will be facilitated and directed within Havering.** **Policy 19 Business Growth encourages and supports sustainable business growth and expansion. It seeks to improve and protect the borough's most important employment land, whilst enhancing and promoting sustainable and appropriate mixed use developments within Havering's town centres and district centres.** **Policies 20, 21, and 22 of the Havering Local Plan each cover particular requirements in regard to Havering's local economy, loss of industrial land, the provision of affordable work space and promoting skills and training.**
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	1. A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. 2. An up-to-date assessment of the deliverability of allocated employment sites, to meet local	**The Havering Local Plan identifies strategic areas for local and inward investment to match the strategy for the Council and to meet anticipated needs over the plan period. It contains criteria-based policies which are flexible for planning for specialist sectors, economic regeneration, infrastructure provision and environmental enhancement.**

| | needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22) | **Havering Local Plan Policy 19 Business growth** seeks to facilitate and support sustainable business growth and expansion. It will promote and ensure the availability of sufficient and suitable land and floorspace to meet varied business needs within Havering.

Havering Local Plan Policy 20 Loss of Industrial Land seeks to protect the employment potential of the existing non designated employment land and floorspace.

Havering Local Plan Policy 21 Affordable workspace seeks to promote opportunities for SME's and small start-ups by ensuring major commercial and mixed-use developments provide flexible and affordable work space.

Havering Local Plan Policy 22 Skills and training seeks to address skills development and training opportunities

Havering's Employment Land Review 2015 provides an assessment of the deliverability of allocated employment sites to meet local needs. To support the submission of the Havering Local Plan, Havering has reviewed the 2015 study. |
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| 1. **Ensuring the vitality of town centres (paras 23-37)** | | |

Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)	• The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.	**The Havering Local Plan :** • **defines town centre networks and hierarchies in Havering** • **defines town centres** • **encourages residential development on appropriate site;** • **allocates appropriate edge of centre sites where suitable and viable town centre sites are not available.** **Section 2 Vision for Havering and Section 3 Strategic Objectives of the Havering Local Plan outline the economic vision and strategy for Havering.** **The Council will promote the vitality and viability of Havering's town centres by enhancing the diversity and quality of uses within them.** **Havering Local Plan Policy 13 Town centre development sets out Havering's town centre network and hierarchies. It maintains Romford as a Metropolitan Town Centre and Hornchurch, Upminster, Elm Park, Collier Row, Harold Hill and Rainham as District Town Centres. (Refer to Map 1, Havering Town Centre Hierarchy, which shows spatially all centres within the borough).** **Policy 1 Romford Strategic Development Area, Policy 13 Town Centre Development, Policy 14**

		Eating and Drinking and Policy 15 Culture and Creativity of the Havering Local Plan each promote the ongoing viability and vitality of town centres. **They do this by directing and promoting an appropriate scale of retail, culture, service industries and office development and homes to Havering's network of town centres and managing the range of uses through development management.**
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)	• An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. • Primary and secondary shopping frontages identified and allocated.	**The Havering Retail & Commercial Leisure Needs Assessment April 2015 provides an assessment of the retail and commercial leisure needs of Havering to 2031 and underpins the policies for town centre uses. The Council reviewed the document as part of the preparation of the Submission version of the Havering Local Plan and an update document is included in the evidence base (see attached list).** **Primary and secondary shopping frontages are identified for Havering's Metropolitan and District Town Centre. Policy 13 of the Havering Local Plan sets out the appropriate uses for such locations.** **All centres and the type of frontages are identified and allocated by property address in Annex A6 of the Havering Local Plan and the Proposals Map Changes Booklet (2018).**

1. Supporting a prosperous rural economy (para 28)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	• Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities.	**Havering Local Plan Policy 19 Business Growth supports sustainable economic growth in Havering's rural areas in line with the requirements of the National Planning Policy Framework.**
2. Promoting Sustainable Transport (paras 29-41)		
Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29) Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29) Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30) Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31) Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)	• Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31. • Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35. • A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. • Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. • If local (car parking) standards have been prepared, are they justified and necessary? (39)	**Policy 23 Transport connections and Policy 24 Parking provision and design of the Havering Local Plan accord with these requirements. They encourage developments which facilitate the use of sustainable modes of transport and a range of transport choices where appropriate, seek to reduce the need to travel through balancing housing and employment provision, promote a mix of uses and access to key facilities by sustainable transport modes and car parking standards which have been prepared and are justified and necessary.** **Havering Local Plan Policy 23 Transport connections identifies strategic transport projects and, in line with the National Planning Policy Framework, sets out the Council's commitment to joint working with partners to better co-ordinate and facilitate transport improvements.** **Sections 1 and 2 of the Havering Local Plan set**

Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)	• Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan.	**out the Vision and objectives for the borough. This includes a specific theme 'Connectivity' . It aims to improve connectivity and accessibility and ease of movement to, from and within Havering, as well as support sustainable transport options including walking and cycling.**
Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)		
Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)		**Section 5 Boroughwide Strategy for Growth provides an overall strategy to deliver 'good growth'. This new growth will be facilitated and directed across the borough in the most accessible and well connected areas with the majority of this growth directed to Havering's key strategic development areas for Romford and London Riverside (as set out in Policies 1 and 2) and have targeted transport improvements.**
For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)		
The setting of car parking standards including provision for town centres. (39-40)		**The growth areas identified will be dependent upon and facilitated by significant public transport investment and improvements. Table 3 under Section 10 Connections lists transport schemes to support the planned levels of growth identified within the Local Plan.**
Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)		
		The arrival of Crossrail /Elizabeth line rail services in 2018/19 is an example of this and will improve accessibility and connectivity in the borough.
		In addition, the implementation of this policy

		will be through the Local Implementation Plan, Mayor of London's Transport Strategy and supplementary strategies, such as the recent 'Healthy Streets' agenda.
3. Supporting high quality communications infrastructure (paras 42-46)		
Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43) Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)	• Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.	**Havering Local Plan Policy 25 Digital connections specifically relates to digital infrastructure and the delivery of high speed, high quality broadband and network services in new developments.**
6. Delivering a wide choice of high quality housing (paras 47-55)		
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)	• Identification of: a) five years or more supply of specific deliverable sites; plus the buffer as appropriate • Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48)	**The Havering Local Plan Housing Position Statement (2018)(including its Housing Trajectory) reflects this requirement. The Council has included a 20% buffer, as past under delivery was been short term and a direct result of cyclical fluctuations linked to the wider economy.** **The Council's extrapolated historic trends drawing on data from the LDD on a long time series provides a robust basis for inclusion of**

	• A SHLAA	**windfall sites as part of its housing supply figure as it covers a full market cycle, providing realistic average for the plan period. The sources of supply from small sites includes change of use, new build, and conversion, thereby reflecting trends such as conversions of houses into flats and infill development.** **Havering took part in the 2013 London wide SHLAA co-ordinated by the GLA.** **In addition, the Council commissioned PBA to undertake an exhaustive local SHLAA to significantly boost its housing land supply.**
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15	**This is contained within the Local Plan Housing Position Statement under Section 8 Annex 1 Housing Sites Table 8.1**
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)	• A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47)	**This is contained within the Havering Local Plan Housing Position Statement.** **This is done via the LDD and the Authority Monitoring Report (AMR) with the latest being the 2016/17 AMR report.** **The Council took part in the 2013 London wide SHLAA co-ordinated by the GLA. Further, to this, the Council commissioned Peter Brett Associates (PBA) to undertake a mini SHLAA to identify additional capacity to boost its housing supply. The Council has engaged consultants (Tibbalds) to support the evidence in the Housing Position Statement in regard to likely capacity on sites.**

Set out the authority's approach to housing density to reflect local circumstances (47).	• Policy on the density of development.	**The Havering Local Plan adopts the current range of London Plan densities related to setting in terms of location, existing building form and massing, and index of public transport accessibility (PTAL). It reflects this within Policy 3 Housing supply of the Havering Local Plan.**
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)	• Policy on planning for a mix of housing (including self-build, and housing for older people) • SHMA • Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50) • Evidence for housing provision based on up to date, objectively assessed needs. (50) 1. Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50)	**Policy 5 Housing mix of the Havering Local Plan provides for a mix of housing including self-build, and housing for older people.** **The Outer North East London Strategic Housing Market Assessment, Report of Findings, September 2016 (and the Update for Havering (2017) established the Objectively Assessed Need for housing in Havering** **Havering Local Plan Policy 5 Housing mix is a borough-wide policy providing for housing mix for all dwelling types, sizes and tenures within new developments, with particular emphasis on family housing (of 3 bed+). Table 2 shows the preferred mix of dwelling sizes by type of tenure.** **The Council has undertaken an exhaustive search for potential housing sites .** **The sites identified by the Council and the GLA's Strategic Housing Land Availability Assessment (SHLAA) (2013) are shown in the Local Plan Housing Position Statement (2018). This establishes that Havering has the capacity**

		to accommodate up to 17,550 new homes over the life of the plan. **Policy 4 Affordable Housing of the Havering Local Plan provides for affordable housing on-site .** **It makes clear that it is only when the applicant has demonstrated to the Council's satisfaction that this is not possible or appropriate will an off-site provision may be acceptable with the developer required to identify and secure a donor site, and only when it has been demonstrated to the Council's satisfaction that a site cannot be identified will a cash in lieu payment to the Council be considered.** **Havering Local Plan Policy 6 Specialist Accommodation supports specialist accommodation for the elderly, disabled, young or vulnerable adults in suitable locations. It resists their loss without adequate alternative provision.**
In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54). In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	• Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. • Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53) • Examples of special circumstances to allow new	*Not Applicable*

	isolated homes listed at para 55.	
7. Requiring good design (paras 56-68)		
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	• Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues.	**Policy 7 Residential design and amenity, Policy 26 Urban design and Policy 27 Landscaping of the Havering Local Plan set out the Council's commitment to securing high quality developments.**
8. Promoting healthy communities (paras 69-77)		
Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).	• Inclusion of a policy or policies on inclusive communities. • Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)	**The Havering Local Plan includes policies on inclusive communities :** • **Policy 1 Romford Strategic Development Area, Policy 2 Rainham and Beam Park Strategic Development Area** • **Policy 3 Housing supply** • **Policy 4 Affordable housing** • **Policy 5 Housing mix** • **Policy 6 Specialist accommodation** • **Policy 7 Residential design and amenity** • **Policy 8 Houses in Multiple Occupation** • **Policy 12 Healthy communities** • **Policy 16 Social infrastructure** • **Policy 19 Business growth** • **Policy 26 Urban design** **All of these policies promote opportunities for meetings between members of the community through mixed-use developments, creation of strong neighbourhood places, active street**

		frontages, safe and accessible environments to deter crime and disorder and developments containing safe and accessible facilities with clear legible pedestrian routes and high quality public space.
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	• Inclusion of a policy or policies addressing community facilities and local service. • Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.	**Havering Local Plan policies plan positively for the shared space, community facilities and other local services including :** • **Policy 1 Romford Strategic Development Area Policy 2 Rainham and Bean Park Strategic Development Area** • **Policy 3 Housing supply** • **Policy 4 Affordable housing** • **Policy 6 Specialist accommodation** • **Policy 7 Residential design and amenity** • **Policy 10 Garden and backland development Policy 12 Healthy communities** • **Policy 15 Culture and creativity** • **Policy 16 Social infrastructure** • **Policy 18 Open space, sports and recreation, Policy 19 Business growth** • **Policy 26 Urban design** • **Policy 28 Heritage assets** **These policies also emphasise the Council's commitment to sustainable development - providing facilities and services alongside future developments across the borough to**

		meet growing demand and maintain the quality of life Havering's residents expect and enjoy today. **Policy 16 of the Havering Local Plan sets out the Council's approach to the provision of social Infrastructure. The policy seeks to promote new and extended infrastructure and protect existing infrastructure where there is a defined need.** **The Infrastructure Delivery Plan (2018) sets out the level of infrastructure required over the plan period. The IDP was reviewed in 2018 as part of finalising the documents to support the Submission version of the Havering Local Plan.**
Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).	• Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) • A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) • Protection and enhancement of rights of way and access. (75)	**Havering conducted an Open Spaces, Leisure and Recreation review of all available sites in preparation of the Havering Local Plan. The review identified the borough's open space needs, deficits and any surpluses and forms part of the evidence base supporting the Havering Local Plan.** **The review informed Havering Local Plan Policy 18 Open sports and recreation which seeks to protect existing open space, sports and recreational facilities in Havering.**
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).	• Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond	**At present there are no Neighbourhood Plans adopted in the borough.** **Havering Local Plan Policy 29 Green**

	the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)	**Infrastructure seeks to protect and enhance the network of green spaces and natural features in Havering. It requires developers to work with existing partnerships to support and enhance green infrastructure provision.** **Policy 29 also links with other policies in the Havering Local Plan which set out requirements on the integration of types of green infrastructure into developments including policies on residential design and amenity, Open space, sports and recreation, Nature conservation, Landscaping, Rivers and river corridors, Heritage assets and Air pollution. These include :** • **Policy 7 Residential design and amenity** • **Policy 18 Open space, sports and recreation** • **Policy 27 Landscaping** • **Policy 28 Heritage assets** • **Policy 30 Nature conservation** • **Policy 31 Rivers and river corridors** • **Policy 33 Air quality**
9. Protecting Green Belt land (paras 79-92)		
Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81) Local planning authorities with Green Belts in	Where Green Belt policies are included, these should reflect the need to: • Enhance the beneficial use of the Green Belt. (81) • Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85)	**More than half of Havering is within the Metropolitan Green Belt. Havering's Green Belt has a very important role in preventing urban sprawl, particularly preventing London from merging with urban areas in Essex.** **The Havering Local Plan is robustly supported**

their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83) When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84) Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)	• Specify that inappropriate development should not be approved except in very special circumstances. (87) • Specify the exceptions to inappropriate development (89-90) • Identify where very special circumstances might apply to renewable energy development. (91)	by two comprehensive studies of the Green Belt in Havering (2016 and 2018). Both studies are included in the evidence base supporting the Havering Local Plan (see attached schedule). The studies consider : • the extent to which the Green Belt as proposed in the Submission version of the Local Plan meets the statutory purposes of the Green Belt as set out in the National Planning Policy Framework • the individual proposals that have been submitted by third parties for more than 80 sites to be removed from the Green Belt. The study considers the harm that would be done to the Green Belt if these parcels were removed from the Green Belt. The 2018 study also considers the extent to which the proposals would be sustainable in the event that they were to be removed from the Green Belt. As a result of these studies the Council is wholly satisfied that the Green Belt boundary proposed in the Submission version of the Local Plan is robust and defensible in terms of the National Planning Policy Framework.

		Havering's Spatial Strategy seeks to promote patterns of sustainable development and to provide continued protection for Havering's Green Belt land. **Areas where very special circumstances might apply to renewable energy, in particular, Wind Energy Development have been set within Policy 36 Low carbon design, decentralised energy and renewable energy of the Havering Local Plan.**
10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)		
Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)	• Planning of new development in locations and ways which reduce greenhouse gas emissions. • Support for energy efficiency improvements to existing building. • Local requirements for a building's sustainability which are consistent with the Government's zero carbon buildings policy (95)	**Havering Local Plan Policy 36 Low carbon, decentralised energy and renewable energy seeks to reduce the borough's carbon dioxide emissions by requiring major development to demonstrate how the targets for carbon dioxide emissions reduction outlined in the London Plan are to be met. The policy supports energy efficiency improvement to existing buildings.** **Havering Local Plan Policy 32 Flood Management of the Havering Local Plan covers flood risk and has been informed by recommendations of the 'Strategic Flood Risk Assessment (2016). The policy requires the use of the Sequential Test and Exception Test approach to flood risk, along with the need for Flood Risk Assessments (FRA) on sites as appropriate as set out in the National Planning Policy Framework..**

Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)	• A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97)	**Havering Local Plan Policy 36 Low carbon, decentralised energy and renewable energy sets out the Council's support for low energy and renewable energy developments and for optimising the energy efficiency of buildings.** **The policy identifies locations on the Proposals Map suitable for 'Wind Energy Developments' and requires major development to prioritise connection to any existing decentralised energy networks and where feasible integrate combined heat and power systems on site.**
Minimise vulnerability to climate change and manage the risk of flooding (99)	• Account taken of the impacts of climate change. (99) • Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) • Policies to manage risk, from a range of impacts, through suitable adaptation measures	**An SFRA was undertaken in preparation of the Local Plan and forms part of the evidence base.** **Havering Local Plan Policy 32 Flood Management has been informed by the recommendations of the SFRA which should be used as a starting point in relation to flood risk guidance.** **The policy seeks to ensure that new and existing developments are safe from all sources of flooding and that measures to reduce flood risk and increase resilience are integrated into the designs of development.**

Manage risk from coastal change (106)	• Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas. • Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.	**Not applicable**
11. Conserving and enhancing the natural environment (paras 100-125)		
Protect valued landscapes (109)	• A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure. • Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs.	**Plan Policy 29 Green infrastructure, Policy 30 Nature conservation and Policy 31 Rivers and river corridors of the Havering Local Plan each to protect and enhance Havering's biodiversity and geo-diversity assets as well as the wider network of green infrastructure and natural features in Havering. They require developers to work with existing partnerships to conserve and extend wildlife corridors and protect Biodiversity Action Plan (BAP) priority species.** **Annex A.7 Biodiversity and geodiversity sites provides an overview of the statutory and non-statutory nature conservation sites in the borough.**
Prevent unacceptable risks from pollution and land instability (109)	• Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity.	**Policy 33 Air quality and Policy 34 Managing pollution of the Havering Local Plan seek to reduce the adverse effects of pollution (most notably air pollution on health, the natural environment and general residential amenity.**

Planning policies should minimise impacts on biodiversity and geodiversity (117)

Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117) | • Identification and mapping of local ecological networks and geological conservation interests.

• Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species | **Policy 29 Green infrastructure and Policy 30 Nature conservation of the Havering Local Plan seek to protect and enhance Havering's biodiversity and geo-diversity assets as well as the wider network of green infrastructure and natural features in Havering. They require developers to work with existing partnerships to conserve and extend wildlife corridors and protect Biodiversity Action Plan (BAP) priority species.** |
| **12. Conserving and enhancing the historic environment (paras 126-141)** | | |
| Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126) | • A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk.

• A map/register of historic assets

• A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126) | **Havering's historic environment is central to its cultural heritage and at the heart of its identity. Havering has Conservation Appraisals reports which outline the borough's strategy for the conservation of its historic environment including heritage assets most at risk.
The Council has a map/register of historic assets.**

Havering Local Plan Policy 28 Heritage assets supports new developments that make a positive contribution to Havering's character and distinctiveness. |
| **13. Facilitating the sustainable use of minerals (paras 142-149)** | | |
| It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are | Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to | **London needs a reliable supply of construction material to support continued growth. There are relatively small resources of workable land-won sand and gravel in London. Aggregates resources exist in Havering.** |

found, it is important to make best use of them to secure their long-term conservation (142) Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)	safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.	**Havering has an apportionment of the land-won aggregate landbank for London, as defined within the London Plan.** **Policy 37 Mineral reserves, Policy 38 Mineral extraction and Policy 39 Secondary aggregates of the Havering Local Plan ensure that mineral led development within defined mineral safe-guarding areas is appropriately assessed to ensure the site can be worked in a sustainable manner; does not give rise to any significant impacts and can be restored to an equivalent quality or an after use of particular community or environmental benefit.**
Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. To be 'justified' a DPD needs to be: • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives.		
Participation Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI	**The consultation statement (2018) along with the Duty to Co-operate statement (2018) provide details of what consultation was undertaken, when, with whom and how it has influenced the Local Plan and the actions taken by the Council to ensure that the consultation process allowed for effective engagement with all interested parties in accordance with the Council's Statement of Community Involvement (2015).** **The consultation statement itself sets out the various stages of consultation, details of the**

		issues raised and how the council responded.
Research / fact finding Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it? What assumptions were made in preparing the DPD? Were they reasonable and justified?	• The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by. AND • Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions. OR • A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the Council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences. OR • For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).	**The reasoned justifications for policies identify the studies, reports and technical papers providing the evidence for the policies set out in the Local Plan.** **A separate list (attached)identifies all studies, reports and technical papers that provide the evidence for the policies set out in the Local plan and are referred to within the body of the Local Plan, so as to provide justification for each policy area.** **The Council considers that the content of the Havering Local Plan is sound and justified through consideration of the SA alternatives and the evidence base available.** **The Havering Local Plan can also be seen to positively reflect the objectives of the National Planning Policy Framework.**
Alternatives Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail	• Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This	**Progress on the Sustainability Appraisal has continued throughout the Local Plan preparation process. Through consideration of the SA work and evidence base the preferred options were carried through into the policies**

showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken? Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?	should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies. • An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.	**in the submission document. The SA Report accompanies the submission document.** **The Evidence base studies as well as the Sustainability Appraisal report have been subject to public consultation and engagement throughout the Local Plan preparation process.** **Chapter 4 of the Sustainability Appraisal for the Havering Local Plan titled "Appraisal findings" shows the assessment of options and alternatives.**

Effective: *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.*

To be 'effective' a DPD needs to:

- Be deliverable
- Demonstrate sound infrastructure delivery planning
- Have no regulatory or national planning barriers to its delivery
- Have delivery partners who are signed up to it
- Be coherent with the strategies of neighbouring authorities
- Demonstrate how the Duty to Co-operate has been fulfilled
- Be flexible

• Be able to be monitored		
Deliverable and Coherent • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved?	• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans). • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).	**Section 14 Delivery and Implementation of the Havering Local Plan-addresses delivery, the means of delivery and the timescales for key developments and initiatives.** **The Infrastructure Delivery Plan (2018) contains the required information including on the potential sources of funding for infrastructure.** **Information about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure is in the Local Development Scheme.** **The Local Plan Section 3 (See 3.1.1 and 3.2.1) and Table 9 under Annex A.8 Monitoring-(p107) show linkages between objectives and corresponding policies and consistency between policies.**
Infrastructure Delivery • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?	• A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward. • A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. • Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues.	**The infrastructure needs of Havering are identified in the Havering Infrastructure Delivery Plan (IDP) (2018).** **The Infrastructure Delivery Plan contains a schedule setting out responsibilities for delivery, mechanisms and timescales.** **The Council commissioned BNP Paribas to undertake a Viability Assessment Report of the Local Plan including on the delivery of affordable housing.**

	• Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.	**The Havering Local Plan sets out that the Council is preparing a Community Infrastructure Levy.**
Co-ordinated Planning Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?	• Sections of the DPD that reflect the plans or strategies of the local authority and other bodies • Policies which seek to pull together different policy objectives • Expressions of support/representations from bodies responsible for other strategies affecting the area	**Section 1.1.3 and Annex A.1.1 of the Havering Local Plan reflect the plans or strategies of the Council and other bodies.** **Responses from major stakeholders such as utility companies for electricity, gas and water, TfL, GLA confirm their support for the Havering Local Plan.**

Flexibility
• Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?
• Does the DPD include the remedial actions that will be taken if the policies need adjustment?
	• Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.
	
	• Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:
	  a. the effectiveness of policies and what evidence is being collected to undertake this
	  b. changes affecting the baseline information and any information on trends on which the DPD is based
	• Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances
		The supporting studies and reports set out the assumptions of the Local Plan and identify when policies might need to be reviewed.
		
		Sections of the annual monitoring report dealing with each policy topic plus the appendices of the report.
		
		Section 9 'Monitoring programme of the SA sets out how the Council will monitor the effectiveness of policies and what evidence is being collected to undertake this and changes affecting the baseline information and any information on trends on which the Local plan is based.
		
		See also Annex A. 8.1 Monitoring in particular

		Table 9.
	• Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision • Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required.	
Co-operation • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? • Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?	• A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why. • The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.	**A Duty to Co-operate Statement (2018) has been produced. It demonstrates effective co-operation through constructive, active and on-going engagement with relevant authorities and bodies that have an interest in the Local Plan.** **The Duty to Co-operate Statement highlights the sharing of ideas, evidence and pooling of resources and the practical policy outcomes of co-operation.**
Monitoring	• Sections of the DPD setting out indicators,	**Annex A.8 Monitoring and Table 9 of the**

• Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?	targets and milestones • Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories • Reference to any other reports or technical documents which contain information on the delivery of policies • Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal.	**Havering Local Plan sets out the indicators, targets and milestones of the Havering Local Plan to be monitored.** **This will be followed by an Authority Monitoring Report on an annual basis which will report on the progress of the indicators below.**

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.

Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?	• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. • Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. • Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. • Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement • Reports or copies of correspondence as to how representations have been considered and dealt with.	**No. The council considers the policies contained within the Local Plan are consistent with the National Planning Policy Framework (NPPF).**

Planning policy for traveller sites

Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Show people have been cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers whilst respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (LPAs) make their own assessment of need for the purposes of planning
- That LPAs work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

Policy Expectations	Possible Evidence	Evidence Provided

Policy A: Using evidence to plan positively and manage development (para 6)		
Early and effective community engagement with both settled and traveller communities.	• Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups.	**The travellers together with their representative bodies and local support groups were engaged severally in discussions about traveller accommodation needs.** **A full account of these discussions can be found within the Gypsy and Traveller Accommodation Assessment (GTAA) (2018) Final report (2018).**
Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.	• Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan. • Collaborative working with neighbouring local planning authorities. • A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions.	**The Havering Gypsy and Traveller Accommodation Assessment (GTAA) Final report (2018) prepared by Opinion Research Services, a reputable consulting firm on Gypsy and Travellers accommodation matters, provides a robust evidence base demonstrating a clear understanding of the needs of the traveller community over the timeframe of the Local Plan and therefore accordingly informs its preparation.**
Policy B: Planning for traveller sites (paras 7-11)		
Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs. Set criteria to guide land supply allocations where	• Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 year worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15.	**A 15 year worth of sites have been allocated for Gypsy and Travellers who meet the planning definition.** **The GTAA Study indicates Travelling Showpeople do not need plots within the Local Plan time frame.**

there is identified need. Ensure that traveller sites are sustainable economically, socially and environmentally.	• An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified. • Policy which takes into account criteria a-h of para 11	**Policy 11 Gypsy and Traveller accommodation of the Havering Local Plan is a criteria based policy providing a basis for development management in the event that proposals come forward in the future.**
Policy C: Sites in rural areas and the countryside (para 12)		
When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.		**Not Applicable**
Policy D: Rural exception sites (para 13)		
If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.	• If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.	**Not Applicable**
Policy E: Traveller sites in Green Belt (paras 14-15)		
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development. Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt)	• Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.	**Not applicable**

to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.		
Policy F: Mixed planning use traveller sites (paras 16-18)		
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	• Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another. • N.B. Mixed use should not be permitted on rural exception sites	**Consideration of the need for sites for mixed residential and business use was made and no sites in public or private ownership were found available and suitable in line with the requirements of paragraphs 16 – 18 of the PPTS.**
Policy G: Major development projects (para 19)		
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	• Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community.	**Not Applicable**

Schedule of submission documents for the Havering Local Plan (2018) including evidence base documents

Submission documents for the Havering Local Plan (March 2018)
Submission Havering Local Plan with proposed modifications 2018
Proposals Map Changes Booklet 2018
Sustainability Appraisal 2017 comprising: • Sustainability Appraisal for the Havering Local Plan 2017 • Non-Technical Summary
Sustainability Appraisal Scoping Report 2015
Draft Sustainability Appraisal Scoping Report – public consultation responses
Habitats Regulation Assessment 2017
Regulation 22 Statement 2018 comprising of: • Regulation 22 Statement • Annex 1 • Annex 7 part A • Annex 7 part B

• Annex 8 • Annex 10 • Annex 17
Consultation Responses Received
Notice of Submission
Duty to Co-operate Statement 2018 Comprising of: • Duty to cooperate statement: • Annex D • Annex E
Health Impact Assessment 2018
Equalities Impact Assessment 2018
Outer North East London Strategic Housing Market Assessment 2016
SHMA update for Havering 2016
Housing Position Statement
Retail and Commercial Leisure Needs Assessment 2015 comprising of:

- Executive Summary - Volume 1 Main Report - Volume 2 - Volume 3
Retail and Commercial Leisure Needs Assessment Addendum 2018
Employment Land Review
Employment Land Review Addendum 2018
Open Space, Allotments and Sport and Recreation Needs Assessment 2016 comprising of: - Open Space Assessment Report - Open Space Standards Paper - Indoor Sport and Leisure Facilities Assessment Report 2016 - Indoor Sport and Leisure Facility Strategy 2016 - Playing Pitch Strategy Assessment Report 2016 - Playing Pitch Strategy and Action Plan 2016
Infrastructure Delivery Plan 2018
Residential Car Parking Standards
Gypsy and Traveller Accommodation Assessment 2018

Gypsy and Traveller Position Statement
Town Centre Position Statement
Wind Resource Evidence Base 2016
Green Belt Study 2016
Site Green Belt Assessment and Sustainability Assessment: Final Report 2018
Viability Assessment 2017
Strategic Flood Risk Assessment 2016 comprising of: • Strategic Flood Risk Assessment • Annex A growth Areas Review • Figures 101-105 • Figures 106-107 • Figures108-114 • Figures A01-A07 • Figures A08-A13 • Figures A14a-f
Transport Position Statement

Havering Strategic Modelling Technical Note 2016
Havering Sites of Importance for Nature conservation Review 2017
Local Development Scheme
Conservation Area Appraisals and Management Plans for: 1. Corbets Tey Conservation Area 2. Cranham Conservation Area 3. Gidea Park Conservation Area 4. Havering-Atte-Bower Conservation Area 5. Langtons Conservation Area 6. North Ockendon Conservation Area 7. RAF Hornchurch Conservation Area 8. Rainham Conservation Area 9. Romford Conservation Area 10. St Andrews Conservation area 11. St Leonards Conservation Area
Statement of Community Involvement 2015
PINS Soundness Self- Assessment 2018
Legal Compliance 2018
Authority Monitoring Report (AMR) (2016-17)

Romford Development Framework (Part of Housing Evidence)
Rainham and Beam Park Masterplan (Part of Housing Evidence)
GLA Strategic Housing Market Assessment 2013
GLA Strategic Housing Market Assessment 2017
GLA Strategic Housing Land Availability Assessment 2013 comprising: • GLA SHLAA 2013 • GLA SHLAA 2013 Appendix 8
GLA Strategic Housing Land Availability Assessment 2017

London Borough of Havering

March 21 2018