

# **London Borough of Havering**

## **Havering Local Plan 2016 – 2031**

### **Inspector's Note – Spatial Strategy and Housing**

1. Following the Hearings into the Examination I have some outstanding concerns in relation to the Local Plan and the evidence which underpins it. These concerns are set out below in relation to the spatial strategy in the Plan and issues surrounding housing land supply. Outstanding issues relating to Gypsy and Traveller accommodation will be set out in a separate note.

### **Spatial Strategy**

2. The Sustainability Appraisal (SA) sets out Options 1-5 which were considered as reasonable alternatives for the spatial strategy in the Local Plan. Chapter 5 of the SA appraises the options against the SA themes set out in section 1.6 of the SA. I am concerned that the appraisal does not consider Option 1 (the preferred option) against many of the SA themes. It is not therefore clear that Option 1 has been assessed, against the reasonable alternatives, and judged to be the most appropriate option to help achieve the environmental, economic and social objectives set out in the SA themes. Further explanation and clearer reporting of the likely significant effects of implementing Option 1 are therefore required to enable me to be satisfied that this Option is the most appropriate when considered against the reasonable alternatives.
3. Chapter 6 of the SA sets out an overview of the reasons for choosing the preferred spatial strategy. It is not clear what evidence the Council has used to reach the conclusions as set out in the SA. For example, in relation to 'Population and Community' the SA sets out that the increased level of growth, in Options 2, 3 and 5, in comparison to the preferred strategy "has the potential to overburden existing facilities and put pressures on existing infrastructure". It needs to be made clear what evidence the Council has used to reach this conclusion.

### **Housing**

4. I am still considering the approach in the Plan of seeking to achieve and exceed the existing London Plan target of 1,170 dwellings per annum.
5. Even if I were to conclude that this approach is acceptable, despite requests in my note dated 10 July 2018 and in the Matters and Issues document, the Council have been unable to justify the supply figures

provided and I am still missing some significant information in relation to housing land supply as set out below.

6. I have concerns that the Plan does not demonstrate that it has sufficient housing land supply to cover the 15 year plan period. Neither has the Council been able to demonstrate that it has sufficient sites to provide a 5 year supply with an additional buffer of 20%.<sup>1</sup>
7. The trajectory as at 7<sup>th</sup> October 2018 sets out the expected completions in the first 5 years of the Plan to 2020/21. However, completions in 2016/17 and 17/18 have only partially been included. An updated table is required including the completions for these two years.
8. In the site by site breakdown the most up to date figures should be used. The Council should be able to justify its expectations in relation to delivery of the sites. Therefore details of assumptions in relation to build-out rates and lead-in times should be provided; evidence of developer interest should be provided where possible; for sites granted planning permission, are further approvals / discharge of conditions required? Are there infrastructure requirements / S106 agreements and what is the timing of these if so? Should a discount rate be applied to the sites with planning permission and pre-application sites? If not, what is the evidence that all of these sites are likely to come forward? The concerns highlighted by representors should be considered; consistency with GLA figures should be checked and any discrepancies explained; the figures for small sites & vacant units should be justified by evidence; do these constitute windfalls? What evidence is there that these will continue to come forward at the rate envisaged? Clarification of the figures in Policy 1 is also requested, having regard to the updated trajectory.

#### *Stepped approach*

9. Prior to the Hearings, the Council was asked to provide details of a possible stepped trajectory for my consideration. The Council provided a memo entitled 'Applying a Stepped Approach to Housing Targets' dated 26 September 2018 (updated 8/10/18). This document states that this approach would provide a supply of 5.46 years or 5.10 years on adoption. However, the figures which demonstrate how this has been calculated have not been included. These figures are required in order for me to consider this option further.
10. The stepped trajectory relies on significant spikes in delivery in 2 years, 20/21 and 22/23. The detailed breakdown of sites within the trajectory needs to demonstrate that this is a realistic and robust assumption of delivery having regard to the information requested in paragraph 8 of this note.

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<sup>1</sup> The buffer should be added to the need including the shortfall since the start of the plan period

*Housing implementation strategy*

11. The Council should produce a housing implementation strategy as required by paragraph 47 of the Framework. This should incorporate the above information and clearly indicate the sources of land supply, when it is expected to be delivered and how this will meet the plan target (in the emerging Plan). It should set out the 5 year land supply situation including the buffer and should justify the method of dealing with any shortfall in delivery since the beginning of the plan period. The Council should set this out in relation to the approach in the Plan and the possible stepped approach.

It is clear therefore that further work is necessary to enable me to consider whether the approach to housing in the Plan is sound or capable of being made so. I am unable to proceed further until I receive the necessary information. The Council should therefore provide me with a timescale for preparation and submission of the additional information by 12 November 2018.

*Susan Heywood*

INSPECTOR

26 October 2018