For the attention of Ms Susan Heywood

Dear Ms Heywood

Havering Local Plan Examination - Response from London Borough of Havering to Inspector’s Note – Spatial Strategy and Housing

Thank you for your note from the Programme Officer received on October 26 2018 following the Examination hearings into the Havering Local Plan.

It is noted that this is an initial advice note dealing with spatial strategy and housing matters and that gypsy and traveller matters will be addressed in a further note.

The Council’s response is set out below and, for convenience, aligns closely with the format and content of your note.

Spatial Strategy

It is understood that that you have concerns that the appraisal in Chapter 5 of the Sustainability Appraisal does not adequately set out the reasoning by which consideration of Option 1 was undertaken.

The Council will undertake further work to provide explanation and clearer reporting of the likely significant effects of implementing Option 1 against the reasonable alternatives.

The Council will clarify the evidence it used to reach the conclusions in Chapter 6 of the Sustainability Appraisal that the levels of growth in other options had the potential to have an adverse impact on existing infrastructure.

Housing

It is noted that you are still considering the approach in the Plan of seeking to achieve and exceed the existing London Plan target of 1,170 dwellings per annum and that further information in regard to housing supply is required.

www.havering.gov.uk
The Council will undertake further work to enable you to conclude that its approach to housing is robust. In particular, it will seek to demonstrate that it has sufficient deliverable and developable sites to meet its 5 year\(^1\) and 10 year targets. In keeping with the National Planning Policy Framework (NPPF), it will also demonstrate, where possible, a 10-15 year supply of developable sites to meet its housing supply target over the 15 year plan period.

In doing so, the Council will provide a revised and updated housing trajectory to replace the trajectory as at October 7 2018 which was provided to the Inspector at the examination. This updated trajectory will include individual assessments of whether a site is deliverable or developable, as well as justification for the phasing of development. This will be based on the most up to date information available to the Council. The breakdown of the trajectory’s figures as they relate to Policy 1 will be clarified.

The trajectory will also include:

- updated information on previous completions including 2016/17 and 2017/18
- details of assumptions in relation to ‘build-out rates’ and ‘lead-in’ times
- evidence of developer interest (where possible)
- confirmation of whether further approvals / discharge of conditions is required for sites with planning permission
- details of any infrastructure requirements and Section 106 agreements and advice about the timing of these

Consideration will be given to whether a discount rate should be applied to the sites with planning permission and pre-application sites. If not, evidence will be provided that these sites are likely to come forward.

Additionally, the Council will also address:

- the concerns highlighted by representors
- consistency with GLA figures and any discrepancies explained
- the justification and clarification behind windfall figures for small sites and vacant units as well as commentary on the rate at which these will come forward

The updated housing trajectory will be used to provide updated 5 year land supply figures based on both the annualised target put forward in the Plan at submission and the stepped approach (trajectory) put forward as an option during the Examination. The reasons behind any significant ‘spikes’ in delivery will be explained.

All of the information requested by the Inspector regarding housing, including the housing trajectory, will be set out clearly within a housing implementation strategy as required by paragraph 47 of the NPPF. The housing implementation strategy will serve to update the Housing Position Statement (2018) and will set out the Council’s approach to monitoring and facilitating housing delivery.

The Council will make every effort to complete this work as soon as possible. It is aiming to have it completed, and approved by Members, for return to you by the end of the calendar year.

---

\(^1\) Calculated with an additional buffer of 20% that is also applied to the shortfall
Other matters

The Council has received your revisions to the list of actions compiled during the Examination and is progressing these.

It is understood that a further note on gypsy and traveller matters is in preparation by you. The Council will assess this when it is received and respond with a programme for undertaking this work.

Yours sincerely,

Martyn Thomas
Development and Transport Planning Manager