Dear Ms Heywood

Havering Local Plan Examination - Response from London Borough of Havering to Inspector following October 2018 Examination in Public

This letter is an update to the one sent to you on 20th December 2018 explaining Havering’s further submission documents in response to your queries following the Examination in Public (EIP) in October 2018.

As agreed, a separate further submission will be provided covering responses to Gypsies and Travellers and parking. The Council will be writing to you shortly with an update on these matters.

It has been appreciated that the Council has had the opportunity to undertake a final check of the documents before sending them to you. This letter is to confirm that all the documents sent you today are our final submission versions.

I can confirm that no changes have been made to the items submitted before Christmas which alter the content of the documents. Any changes have been made for the purpose of formatting or tidying up documents.

Havering has undertaken the additional work required and this has been provided in the following documents that are submitted for your consideration:

1. Action List

This document lists all the actions that were agreed with you after the EIP and records where responses on each of the action points can be found within the Council’s response documents.

2. Proposed Additional Modification Document

This document includes the proposed additional modifications made after the EIP as well as those that have already been submitted prior to the EIP for consideration. Modifications that were set out before the Examination have retained their ‘PM’ prefix numbering while those that result from the Examination are included with the prefix ‘EP’.
3. Sustainability Appraisal for Havering Local Plan SA Report Addendum December 2018

This document provides further information to provide to provide explanation and clearer reporting of the likely significant effects of implementing Option 1 against the reasonable alternatives. Additionally, it clarifies the additional evidence the Council 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.

4. Supplementary Retail Note

This document provides a response to the Inspector's queries related to Policy 13. It includes further evidence that retail development needs can be met in existing town centre footprints as well as providing the evidence to compare the vacancy rates with other areas in London and further justification for the proposed lower threshold for impact assessments (locally set threshold justification).

5. Housing Position Statement- Technical Update- including the Housing Implementation Strategy, Housing Trajectory and Supporting evidence

These documents contain the responses relating to queries in relation to Matter 3 - Housing.

The Council has undertaken further work to enable you to conclude that its approach to housing is robust. In particular, it has sought 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.

Also provided is a revised and updated housing trajectory for December 2018 to replace the trajectory submitted as at October 7 2018. This updated trajectory includes individual assessments of whether a site is deliverable or developable (site compendiums), as well as justification for the phasing of development.

The site compendiums (Appendixes: Annex 2: Site Compendium – Romford Strategic Development Area Annex 3: Site Compendium – Rainham and Beam Park Strategic Development Area Annex 4: 12 Site Compendium – 12 Estates Regeneration Sites (outside of the SDAs) Annex 5: Site Compendium – Other major sites outside of the estates regeneration programme and SDAs are very large and will be uploaded to the Council website as requested. We can also arrange for them to be sent via drop box.

This is based on the most up to date information available to the Council. The Council will continue to monitor the housing trajectory ahead of the continued examination hearings.

The trajectory and supporting information includes:

- 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)

\(^1\) Calculated with an additional buffer of 20% that is also applied to the shortfall
• 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 has been given to whether a discount rate should be applied to the sites with planning permission and pre-application sites.

Additionally, the Council has addressed:

• the concerns highlighted by representors, through individual site assessments of deliverability
• consistency with GLA figures and any discrepancies
• 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

All of the information requested regarding housing (including the housing trajectory), is set out in a revised and updated Housing Position Statement Technical Update (2019) document and its annexes, including the housing trajectory. The Housing Position Statement also includes a housing implementation strategy as required by paragraph 47 of the NPPF.

6. Further response from London Borough of Havering to Inspector

This document contains comprehensive responses to the other matters on the action list not addressed in the other documents outlined above.

7. Statements of Common Ground

The Council is currently securing signed copies of each of the Statements of Common Ground referred to at the Examination. As soon as these are completed, they will be formally provided.

Yours sincerely,

Martyn Thomas
Development and Transport Planning Group Manager