

## Annex 2 Conformity with the Publication London Plan – Housing Supply Components

Black text is London Plan policy, red text is commentary on the approach in the Local Plan.

### Policy H1 Increasing Housing Supply

A – deals with Housing numbers – please see commentary in main letter

B To ensure that ten year housing targets are achieved, boroughs should

1) Prepare delivery focused Development Plans which:

- a) Allocate an appropriate range and number of sites that are suitable for residential and mixed use development and intensification

The Havering Local Plan does not allocate sites, however the housing trajectory does identify a range of sites for both residential and mixed use development. We have already rehearsed the argument at Examination that many of our sites are large and will take time to come forward, hence our stepped approach to housing delivery. We have also rehearsed the reasons for choosing to prepare, subsequent to the main Local Plan, an Allocations DPD. That DPD will now, however, be subsumed within the Plan update.

- b) Encourage development on other appropriate windfall sites especially from the sources of supply listed in B2

Local Plan Policy 3 Housing Supply states:

The delivery of new homes will also be achieved by:

vi. Promoting mixed use development in town centres and designated out of town centre locations;

**vii. Prioritising all non-designated land for housing when it becomes available;** (emphasis added)

**viii. Supporting the re-use of brownfield sites when they become available;** (emphasis added)

ix. Supporting residential development proposals around stations where it is compatible with the character of the local area. Major development proposals around stations will be subject to design review;

**x. Supporting appropriate development of infill, under-utilised and vacant sites in the borough's sub-urban areas;** (emphasis added)

xi. Resisting the net loss of residential development;

xii. Supporting initiatives to bring back empty residential properties into use;

xiii. Supporting self-build initiatives;

The provisions emphasised above are of particular application in ensuring general conformity with the London Plan.

- c) Enable the delivery of housing capacity identified in opportunity areas

The Local Plan identifies two Strategic Development Areas (Romford and Rainham and Beam Park) which align with the Opportunity Areas identified in the London Plan.

Local Plan contains specific policies for each area - Policy 1 Romford Strategic Development Area and Policy 2 Rainham and Beam Park Strategic Development Area

The Local Plan seeks to deliver over 6,000 new homes in Romford and over 3,000 homes at Rainham and Beam Park.

In their Regulation 19 consultation response the GLA stated: *The Major welcomes the draft plans positive approach to growth, including housing supply. The spatial strategy rightly identified Romford and Rainham and Beam Park as areas in which to concentrate growth as these areas are receiving significant investment in transport and have been identified as housing zones which will further support the delivery of homes in these areas.*

- 2) Optimise the potential for housing delivery on all suitable and available brownfield sites through their development plans and planning decision, especially the following sources of capacity

- a) Sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary

Local Plan Policy 3 Housing Supply states:

The delivery of new homes will also be achieved by:

...

ix. Supporting residential development proposals around stations where it is compatible with the character of the local area.

x. Supporting appropriate development of infill, under-utilised and vacant sites in the borough's sub-urban areas;

- b) Mixed use redevelopment of car parks and low density retail parks and supermarkets

Local Plan Policy 3 Housing Supply states:

The delivery of new homes will also be achieved by:

vi. Promoting mixed use development in town centres and designated out of town centre locations;

- vii. Prioritising all non-designated land for housing when it becomes available;
- viii. Supporting the re-use of brownfield sites when they become available;

- c) Housing intensification on other appropriate low density sites in commercial leisure and infrastructure uses

See above

The housing trajectory identifies a number of sites in/previously in commercial use for mixed use development

- d) The redevelopment of surplus utilities and public sector owned site

The housing trajectory includes the former gas works site, as an example

- e) Small sites

Local Plan policy 3 (Housing supply) supports the delivery of **at least** 1,500 new homes on small sites across the borough and through vacant units returning to use. (emphasis added)

- f) Industrial sites that have been identified through the processes set out in Policy E4, E5, E6 and E7

The release of the former gas works site from its previous designation as a Secondary Employment Area to facilitate residential development is an example of this

- 3) Establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

- C Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.

The Council updates its brownfield register annually, but this is outside of the Local Plan process.

Paragraph 5.1.11 of the Local Plan makes reference to Havering's brownfield register.

- D Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 and should work with the Mayor to resolve any anticipated shortfalls.

The Housing trajectory was updated in October 2019 as part of the Local Plan examination. Outside of the Local Plan process the Council will publish an updated housing trajectory annually as part of its Authority Monitoring report.

- E Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed use development, taking into account future public transport capacity and connectivity levels.

Rainham and Beam Park Strategic Development Area is an example of where the Council has already done this. The development densities in this area are predicated on the new Beam Park Station.

- F On sites that are allocated for residential and mixed-use development there is a general presumption against single use low density retail and leisure parks. These developments should be designed to provide a mix of uses including housing on the same site in order to make the best use of land available for development

Local Plan Policy 13 Town Centre Development states that the Council not support proposals for single use retail development which do not optimise the development potential of the site