

Sustainability Appraisal (SA) for the Havering Local Plan

SA Adoption Statement

November 2021

Quality information

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1. Introduction

Background

- 1.1 The London Borough of Havering has recently prepared a new Local Plan (Havering Local Plan 2016-2031) to replace the existing planning policies in the Havering Local Development Framework. The new Local Plan, which covers the period to 2031, will be the key planning policy document for the borough and will guide decisions on the use and development of land.
- 1.2 Replacing the Core Strategy and Development Management Policies Development Plan Document and the policies in the Romford Area Action Plan, the Local Plan together with the London Plan 2021 will comprise the Development Plan for the borough and will be the primary basis against which planning applications are assessed.
- 1.3 The Local Plan was formally published in August 2017 ahead of being submitted to the Planning Inspectorate for examination in March 2018. It was then the focus of examination hearings in October 2018 and May 2019. As a result of discussions at the hearing sessions and representations received during examination a number of changes or 'Main Modifications' were proposed to the Local Plan and published in August 2020.
- 1.4 Subsequent to the publication of the Main Modifications, the Inspector requested a number of Further Main Modifications to be made to the Local Plan to ensure it remains in general conformity with the London Plan, specifically the London Plan 2021 recently adopted in March 2021. These Further Main Modifications were published for consultation in July 2021.
- 1.5 The Inspector published a report into the Local Plan's legal compliance and soundness on 14th October 2021 and concluded that the Local Plan is legally compliant and sound. The Local Plan was recommended for adoption at a Full Council meeting in November 2021.
- 1.6 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making, led by consultants AECOM (from late 2016 onwards; with the initial stages of the SA having been led by the London Borough of Havering). SA is a mechanism for assessing and communicating the likely effects of an emerging plan, and reasonable alternatives, with a view to achieving sustainable development.

SA explained

- 1.7 SA assesses the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the emerging Local Plan's contribution towards sustainable development.
- 1.8 An SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). SA widens the scope of the assessment to also include social and economic issues.

This SA Adoption Statement

- 1.9 Regulation 16 of the SEA Regulations sets out the post-adoption procedures for the SEA, and requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA Report and an 'SEA adoption statement', and inform the public and consultation bodies about the availability of these documents. The consultation bodies are Historic England, Natural England and the Environment Agency.
- 1.10 In addition, Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) sets out a need to publish the final SA Report alongside the Adopted Local Plan.

1.11 In the context of the requirements of the SEA Regulations, this SA Adoption Statement for the Havering Local Plan must explain:

- How environmental (and sustainability) considerations have been integrated into the Local Plan.
- How the Environmental Report (contained within the SA Report) has been taken into account during preparation of the plan.
- The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.
- How the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report have been taken into account.
- The measures that are to be taken to monitor the significant effects identified for the Local Plan.

1.12 In association with the above requirements, the SA Adoption Statement is structured as follows:

- **Chapter 2** of this SA Adoption Statement presents the narrative for plan making and the accompanying SA process to date. This incorporates a description of the elements required by the first three bullet points above
- **Chapter 3** describes how consultation responses have been taken into account through the Local Plan/SA process
- **Chapter 4** presents the monitoring programme for the SA.

2. How the SA process has informed and influenced the development of the Local Plan

Overview of Local Plan development/SA since 2015

- 2.1 Preparation of the Havering Local Plan began in 2015. The SA process has informed and influenced the Local Plan throughout its development. Reflecting this, four main SA documents have been prepared to accompany key points in plan development, all of which have supported consultation and decision making at the relevant stage.
- 2.2 **Figure 2.1** below summarises the key documents which have been prepared for the Local Plan and accompanying SA process to date.

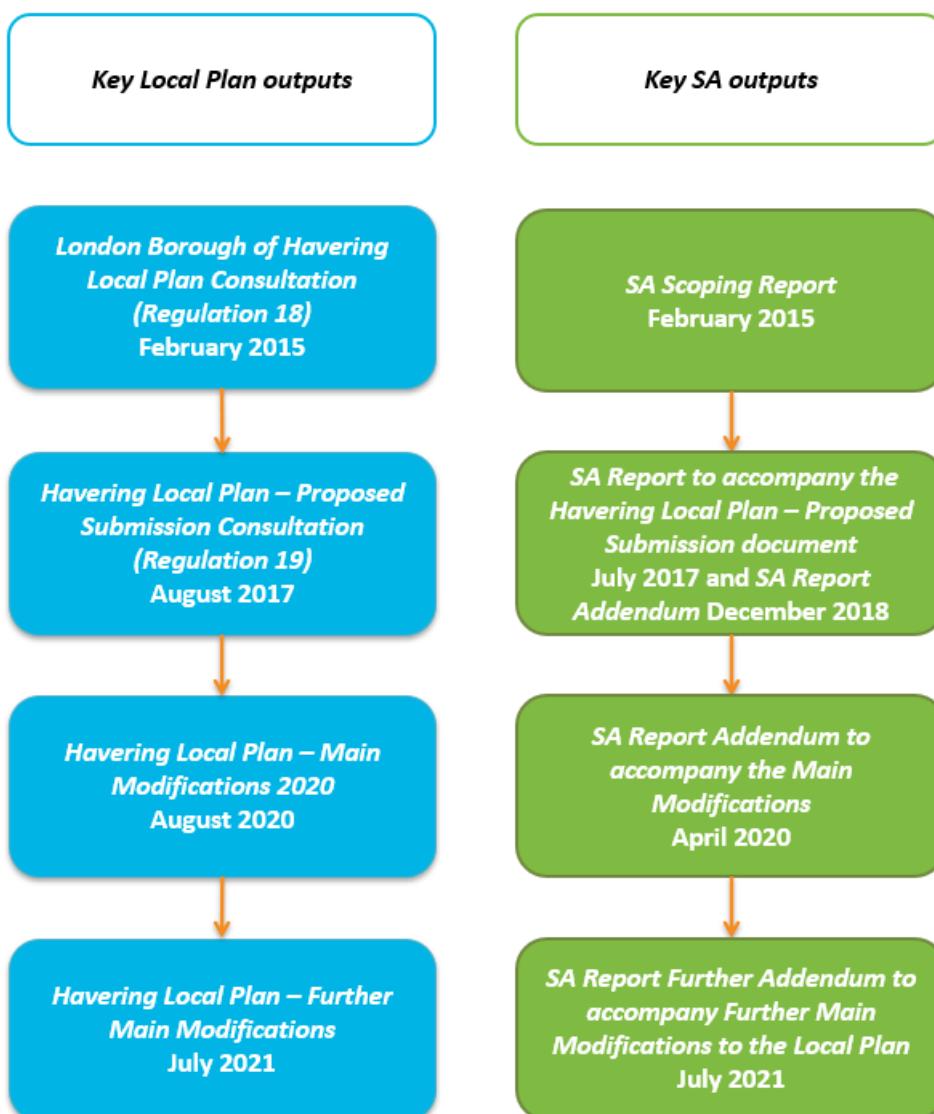


Figure 2.1: Key outputs of the Havering Local Plan and accompanying SA process

Appraisal of reasonable alternatives for the Local Plan

- 2.3 A key element of the SA process is the appraisal of ‘reasonable alternatives’ for the Local Plan, which should be undertaken in time to inform development of the draft plan. The assessment of reasonable alternatives was undertaken between 2016 and early 2017, and informed the preferred spatial strategy (specifically in terms of housing numbers and distribution) for the borough and potential locations for proposed development.
- 2.4 The need to develop a broad growth strategy for the borough was identified early on in the development of the Local Plan. As such, it was recognised that this issue should be addressed via appraisal of reasonable alternatives through the SA process.
- 2.5 In light of the objectively assessment housing need (OAHN) established for Havering and the Local Plan target for the borough, five spatial strategy options were developed and appraised through the SA process. These ranged from the delivery of 1,253 dwellings per annum (dpa) in the borough in the first ten years of the plan to 1,549 dpa.
- 2.6 The spatial strategy options, and the rationale for each one, are presented in Table 2.1.

Table 2.1: Spatial strategy options considered as reasonable alternatives, and rationale

Spatial distribution option	Rationale
Option 1 – meeting the London Plan target (1,170 dwellings pa to 2025) and reflecting current densities	This option seeks to deliver in the region of 12,180 dwellings in the first ten years of the Local Plan period. It is based on a distribution reflecting the provisions of the current Local Plan (including an existing focus on Romford and the key district centres of Hornchurch and Upminster), coupled with a further focus on Rainham / Beam Park as a Strategic Development Area (SDA).
Option 2 – greater density in the two Strategic Development Areas	This option seeks to deliver in the region of 13,412 dwellings in the first ten years of the Local Plan Period. This is through a variance of Option 1 which increases densities in the SDAs of Romford SDA and Rainham / Beam Park, including in the respective Housing Zones in these locations. These densities would be over and above the current indicative densities recommended through the London Plan Housing Supplementary Planning Guidance (SPG) document (March 2016). ¹
Option 3 – greater density the two SDAs and further development in Hornchurch and Upminster, coupled with greater densities delivered through the Council’s estate renewal programme	This option seeks to deliver in the region of 13,650 dwellings in the first ten years of the Local Plan through increasing densities at Romford, Hornchurch and Upminster and delivering increased densities in the areas covered by Havering Council’s estate renewal programme. The densities will be over and above those proposed through the London Plan Housing Supplementary Planning Guidance for different categories of locations.
Option 4 – lower density to accommodate more family/older people’s housing with corresponding limited Green Belt development in recognition of the trade-offs involved	Delivering in the region of 12,180 dwellings in the first ten years of the Local Plan, this option responds to existing demographic trends in the borough which, as highlighted by the SHMA, indicate increased demand for family housing and older people’s housing. Given land supply constraints, this option would require a degree of development within the Green Belt.

¹ GLA (March 2016) Housing Supplementary Planning Document
https://www.london.gov.uk/sites/default/files/the_london_plan_2016_jan_2017_fix.pdf

Spatial distribution option	Rationale
Option 5 – exceeding OAHN by facilitating greater density in the two SDAs, further development in Hornchurch and Upminster, and limited Green Belt release	This option seeks to deliver 15,010 dwellings in the first ten years of the Local Plan, which is significantly above the established OAHN for the borough. It will facilitate development within the Green Belt to help contribute to maintaining a five-year land supply.

- 2.7 These options reflected existing and likely land availability in the borough, as indicated by the outcomes of evidence base studies undertaken to inform the Local Plan.
- 2.8 The five reasonable alternatives identified above were subject to appraisal through the SA process. The findings of the SA for the spatial strategy alternatives was presented in Chapter 4 of the Regulation 19 SA Report (2018)² with a refined appraisal presented in an SA Report Addendum prepared following examination hearings.³ The findings of the SA informed the Council's outline reasons for selecting the preferred approach, which is presented in the SA Report Addendum and repeated below.

Preferred approach for the Local Plan

The Local Plan's preferred spatial strategy

- 2.9 During the preparation of the Local Plan, the Council opted for a spatial strategy which most supports the intensification of its two Strategic Development Areas at Romford, and Rainham and Beam Park. Further growth will be accommodated from major regeneration of the Council's own housing estates, which will support an ambitious local authority home building programme. In recognition that the borough's district centres are important providers of retail, leisure and essential services, the spatial strategy seeks to maintain and enhance these centres and support the intensification of uses including residential development and business growth.
- 2.10 The spatial strategy also seeks to provide continued protection for Havering's extensive Green Belt land. This is in conformity with the London Plan (2016) that stated that:

"growth will be supported and managed across all parts of London to ensure it takes place within the current boundaries of Greater London without encroaching on the Green Belt, or on London's protected open spaces" (London Plan (2016) Policy 1 p34)

"The Mayor strongly supports the current extent of London's Green Belt, its extension in appropriate circumstances and its protection from inappropriate development." (London Plan (2016) Policy 7.6 p312)
- 2.11 The Council considers that this spatial strategy best meets the aim of delivering sustainable development in accessible locations by seeking to meet and exceed the London Plan housing target, whilst protecting the Green Belt and ensuring the character and amenity of the borough is maintained and enhanced for future generations to enjoy. As set out in paragraph 5.1.3 of the Local Plan:

"The Council has developed its strategy to deliver 'good growth' in the right locations across Havering having regard to the potential of the individual areas identified for that growth and the importance of making sure it has a good fit with and integrates well with its surroundings. This growth will be dependent upon and facilitated by significant public transport investment and improvements. In line with national and Mayoral planning policy, development is to be directed to the most accessible and well connected areas in the borough where there are existing concentrations of supporting social and community infrastructure or where this can be delivered alongside, and supported by, new developments."

² London Borough of Havering (August 2017) SA Report to accompany the Havering Local Plan – Proposed Submission document.

³ London Borough of Havering (December 2018) SA Report Addendum.

- 2.12 Given the requirement of the NPPF to meet sustainable development needs so far as is consistent with the policies of that Framework, the Council has developed the most appropriate spatial strategy to respond to this. The spatial strategy and Local Plan Policies 1 and 2 for Romford and Rainham and Beam Park address this requirement for sustainable development by proposing the two Strategic Development Areas and appropriate development in other town centres outside of these locations. It reflects the strategic context provided by the NPPF and the London Plan, with which the Local Plan has to be in 'general conformity'. It therefore aims to translate the policy approaches applicable to Havering into planning policies that are both relevant and necessary.
- 2.13 This approach was supported by the consultation response received through the Regulation 19 consultation from the Mayor of London, which highlighted:
- "The Mayor welcomes the draft plan's positive approach to growth, including housing supply. The spatial strategy rightly identifies Romford and Rainham and Beam Park as areas in which to concentrate growth as these areas is receiving significant investment in transport and have been identified as Housing Zones, which will further support the delivery of homes in these areas."*
- 2.14 The following outline provides an overview of the key elements which influenced the choice of the preferred spatial strategy for the Local Plan.

Opportunity Areas

- 2.15 The Romford Development Framework (2015) identified the potential for development in Romford;
- "Romford Town Centre has huge potential for economic growth. By utilising property demand and value growth driven by the arrival of Crossrail, it can deliver thousands of new homes and jobs."(p5)*
- 2.16 The Rainham Beam Park Planning Framework (2016) identified the potential in Rainham and Beam Park;
- "In June 2015, following a successful bidding process, Rainham and Beam Park was identified as one of the GLA's new 'Housing Zones'. This will bring tens of millions of pounds in investment funding towards the social and physical infrastructure necessary to support new homes in the area and will help to overcome some of the challenges of delivering development within the Rainham and Beam Park area" (p13)*
- 2.17 Whilst Rainham and Beam Park is already identified within the London Riverside Opportunity Area, Romford is now also identified as an Opportunity Area in the draft London Plan.
- 2.18 London's Opportunity Areas are recognised in the London Plan as the capital's major reservoirs of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility. The London Plan says that typically they can accommodate at least 5,000 jobs or 2,500 new homes or a combination of the two, along with other supporting facilities and infrastructure.
- 2.19 Romford is also identified in the London Plan as a Metropolitan Town Centre. The Mayor of London had already recognised Romford as a potential area for growth and, in early 2016, Romford was granted Housing Zone Status which will provide significant investment in order to accelerate the delivery of new homes. There are a number of opportunity sites within the Romford Strategic Development Area which can accommodate significant housing growth.
- 2.20 Policy 2.15 of the London Plan (2016) outlined that town centres are designated as areas of commercial intensification and residential development. As such, development proposals in town centres should *"sustain and enhance the viability and vitality of town centres"*, accommodate economic and/ or housing growth, support and enhance the competitiveness, quality and diversity of town centre retail, leisure, arts, cultural and other consumer services and public services. This was also supported by the Havering Retail and Commercial Leisure Assessment (2015) and update (2018), the Employment Land Review (2015), and Addendum

(2018) which highlights these locations also offer a range of investment opportunities with substantial capacity to accommodate new homes, jobs and infrastructure.

Strategic Development Areas, Housing Zones and housing estate regeneration

- 2.21 The Strategic Housing Land Availability Assessment (2017) highlighted that Romford and London Riverside (which Rainham and Beam Park forms part of) are areas with large site capacity (p76). The Housing Position Statement (2018) also identified both Romford and Rainham and Beam Park as key areas for growth within Havering and profiles the expected number of housing units to be delivered. As highlighted by the Housing Position Statement:

"There are a number of opportunity sites within the Romford Strategic Development Area which can accommodate housing growth. There is an increased demand for homes in east London, and with areas closer to central London becoming unaffordable to many, both demand and house values will grow, especially with the arrival of Crossrail..."

"Rainham and Beam Park Strategic Development Area is a major growth and regeneration area and provide the opportunity to establish an exciting new residential neighbourhood linked to the delivery of a new railway station on the existing Essex Thameside line at Beam Park."

(Housing Position Statement (2018))

- 2.22 The building of a significant number of new homes in the two Strategic Development Areas will be supported by means of a range of planning and financial measures through the Mayor of London's Housing Zone Programme. Designation of the two Housing Zones has been a significant influence on the patterns and forms of development that the Local Plan will seek to deliver.
- 2.23 Havering is one of only a few London boroughs with two Housing Zones and the Council considers that this will be an important element in its ability to deliver the new homes that the borough needs over the plan period because it provides a high degree of certainty that the new homes will come forward.

"The building of homes in these areas is supported by a range of planning and financial measures. HZ programmes are funded by a combination of local authority funding, Greater London Authority (GLA) direct and recoverable grant, and external funding. HZ finance will be used predominately to deliver physical infrastructure in advance or in parallel to developments, which will significantly increase viability and hence improve Community Infrastructure Levy/section 106 contribution potential. In the Local Plan, each Housing Zone forms the focus for a Strategic Development Area (SDA)." (Havering Infrastructure Delivery Plan (2018))

- 2.24 The quantum and location of growth will also be partly accommodated as a result of the Council's commitment to major regeneration of its own housing estates. The Council is planning to build a significant number of new homes in one of the most ambitious local authority home building programmes in the country. The initial programme focuses on 12 sites across the borough (including sites close to Romford and Rainham) and is expected to deliver over 2,000 additional homes.
- 2.25 Havering is committed to securing and promoting 'good growth' and it would not limit other sites coming forward that are not included in the Strategic Development areas if they provide the opportunity to deliver this. The Council takes a proactive approach to working with developers and landowners to support them at a very early stage of pre-application development discussions to ensure that suitable sustainable proposals are submitted.

Infrastructure

- 2.26 The strategy recognises the importance of communities being properly served by timely and effective provision of infrastructure. It seeks to ensure that all new development including, especially, new housing is properly supported by the provision of necessary infrastructure including public utilities and social and community facilities. This includes the school places and health care facilities necessary for the quantum of proposed new development and is reflected in the Strategic Development Area policies explicitly highlighting the infrastructure that will be necessary to support change and growth in these areas. Specific policies in the Local

Plan deal with education, social and community facilities and identify where these will be necessary over the period of the Local Plan.

- 2.27 The Council's approach has been shaped by information in the Infrastructure Evidence Base Report prepared in 2015 to support the emerging Havering Community Infrastructure Levy. The Infrastructure Evidence Base Report subsequently formed the basis of the Infrastructure Delivery Plan that is a key part of the evidence base of the Local Plan. The approach in the Local Plan also has regard to the Council's Local Implementation Plan strategy and annual submissions from which transport themed programmes and projects are derived.
- 2.28 The Infrastructure Evidence Base Report considered a wide range of infrastructure types. It examined the adequacy of existing provision and provided an assessment of future needs based on factors such as expected population growth and the delivery of other plans and strategies of the Council. The report recognised that in many instances there was already a commitment to new infrastructure being provided in particular locations such as Romford and Rainham and Beam Park by reason of the accessibility of these areas and that they were already identified as growth areas through plans and strategies of the Mayor of London and the Council.

Accessibility and transport

- 2.29 The proposed spatial strategy supports the development of housing in the most accessible locations in the borough with excellent transport links, especially to areas outside of Havering.
- 2.30 Accessibility will further improve with the introduction of rail services on the Crossrail / Elizabeth line and the delivery of the new Beam Park station on the existing Thameside line at Rainham. Major public realm improvements to aid accessibility to and from Romford and aid traffic flow along the Ring Road are also planned as part of the Mayor's 'Liveable Neighbourhoods' funding, and through the A1306 Beam Parkway scheme in Rainham.

Green Belt

- 2.31 In the course of preparing the Local Plan, the Council commissioned two Green Belt studies. The Green Belt Study (2016) which found that all of the Green Belt in Havering has value when considered against the purposes of the Green Belt. The Sites Green Belt Assessment (2018) assessed 84 sites that were submitted to the Council for potential release from the Green Belt through the Local Plan process. The assessment considered implications for the Green Belt if these sites were released and considered their sustainability.
- 2.32 In light of these studies, the Council is confident that sufficient land supply to meet its development needs (including housing) has been found outside the Green Belt.

Environmental considerations

- 2.33 The Council considers the preferred spatial strategy provides an appropriate balance between delivering growth and protecting and enhancing the quality of the borough's environment.
- 2.34 In terms of the historic environment and landscape/townscape character, the Council considers that the level of growth proposed in the preferred spatial strategy optimally balances the need to create opportunities for enhancing the fabric and setting of heritage assets and townscape character, while not proposing a level of growth which would lead to wider scale impacts on the historic environment and townscape/landscape quality. This includes through seeking to protect the Green Belt.
- 2.35 In terms of biodiversity assets, the facilitation of increased densities in the two Strategic Development Areas and some district centres, and the intensification of uses enabled by the estate renewal programme facilitated through the preferred spatial strategy will reduce the need for new development areas in other parts of the borough. This includes in parts of the Green Belt with biodiversity value. The Council also considers that the preferred spatial strategy offers significant opportunities to enhance ecological networks in urban parts of borough, including through the rejuvenation of key corridors, including river corridors, and improved green infrastructure networks.

- 2.36 Through focusing development on the more accessible locations in the borough by public transport and walking and cycling networks, the Council considers that the preferred spatial strategy will promote air and noise quality and support a limitation of greenhouse gas emissions from transport. It is also considered that the spatial strategy's focus on previously developed land will support soil resources, and limit the loss of productive agricultural land.

Appraisal of the Draft Plan

- 2.37 At various stages of plan making, the SA process has appraised and informed emerging plan policies.
- 2.38 The planning policies for the Local Plan were developed in response to evidence base studies, the appraisal of reasonable alternatives undertaken through the SA process and to reflect consultation responses on plan-making, including the Regulation 18 consultation undertaken for the Local Plan prior to Regulation 19 consultation in February 2015. An appraisal of the initial version of the Local Plan's planning policies was presented in Part 2 (Chapter 8) of the SA Report (July 2017) accompanying the Proposed Submission version of the Local Plan.

Main Modifications and Further Modifications

- 2.39 The Local Plan was submitted to Government for Examination in March 2018. It was then the focus of examination hearings in October 2018 and May 2019. As a result of discussion at the hearing sessions and representations received during examination a number of changes or 'Main Modifications' were proposed to the Local Plan and published in August 2020. These were appraised through the SA, with findings presented in an SA Report Addendum to accompany the Main Modifications consultation.⁴
- 2.40 Subsequent to the publication of the Main Modifications, the Inspector requested in summer 2021 a number of further modifications to be made to the Local Plan to ensure it remains in general conformity with the London Plan, specifically the London Plan 2021 recently adopted in March 2021. In response, a further SA Report addendum was prepared to support consultation on these further modifications.⁵
- 2.41 The Inspector's Report on the Havering Local Plan was published in October 2021. It concluded that the Local Plan provides an appropriate basis for the planning of the London Borough of Havering to 2031.

⁴ London Borough of Havering (April 2020) SA Report Addendum to accompany the Main Modifications

⁵ London Borough of Havering (July 2021) SA Report Addendum to accompany the Further Modifications

3. Consultation responses and how they have been taken into account

- 3.1 Regulation 16 of the SEA Regulations requires that the SA Adoption Statement includes a description of how the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report have been taken into account.
- 3.2 As discussed in **Chapter 2**, at each stage of the Local Plan's development, an SA Report was published alongside the Local Plan for consultation.
- 3.3 Consultation included with:
 - the three statutory bodies for SEA (the Environment Agency, Historic England and Natural England);
 - other stakeholders; and
 - the general public.

Consultation responses received on the Local Plan

- 3.4 A summary of the responses received at Regulation 18 and 19 consultation can be accessed at the following location:

https://www.havering.gov.uk/info/20034/planning/183/planning_policy/7
- 3.5 The consultation responses received at the subsequent Main Modifications and Further Modifications stages can be accessed at the following locations:

<https://havering.objective.co.uk/portal/lpmm?tab=list>

<https://havering.objective.co.uk/portal/lpfmm?tab=list>

4. Monitoring

Measures decided concerning monitoring

- 4.1 The SEA Regulations require that: "*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.*"
- 4.2 The Regulations also state that the SA Adoption Statement should set out "...*the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.*"
- 4.3 The purpose of monitoring is to measure the significant sustainability effects of a plan, as well as to measure success against the plan's objectives. This will enable appropriate interventions to be undertaken if monitoring highlights negative trends relating to the relevant elements. It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place. To this end, many of the indicators of progress chosen for the SA require data that is already being routinely collected at a local level by the London Borough of Havering and its partner organisations. It should also be noted that monitoring can provide useful information to inform the development of future plans and programmes, including future iterations of the Local Plan.
- 4.4 **Table 4.1** therefore outlines a monitoring programme for measuring the Local Plan's implementation in relation to the areas where the SA has identified significant effects or where significant opportunities for an improvement in sustainability performance may arise. It also seeks to monitor where uncertainties relating to the appraisal findings arose and suggests where monitoring is required to help ensure that the benefits of the Local Plan are achieved through the planning process.

Table 4.1: SA monitoring programme for the Havering Local Plan

Area to be monitored	Indicator	Data source	Frequency of monitoring
Effect on the delivery of renewable energy	Renewable energy installation capacity in MW	London Borough of Havering	Annual
Loss of Green Belt land	Number of hectares of undeveloped Green Belt land lost to development	London Borough of Havering	Annual
Effect of new development on air quality	No. of days when air pollution is moderate or high for NO ₂ or PM ₁₀	London Borough of Havering	Daily
Green infrastructure provision	Net loss/gain of public open space, playing fields and leisure floorspace	London Development Database	Annual
Economic vitality	Net additional office floorspace	London Development Database	Annual
Car use	Car use and car ownership across the borough	Transport for London and London Borough of Havering	Annual

Area to be monitored	Indicator	Data source	Frequency of monitoring
Effects on townscape character	Proportion of major applications approved without a detailed landscape scheme	London Borough of Havering	Annual
Minerals supply	Loss of mineral safeguarded land to development	London Borough of Havering	Annual
Employment in emerging sectors of Havering's economy	Number of affordable workspace units delivered	London Borough of Havering	Annual

