

11 October 2017

Planning and Licensing Committee

Response to the London Borough of Havering Draft Local Plan Regulation 19 consultation

Report of: *Phil Drane, Planning Policy Team Leader*

Wards Affected: *All*

This report is: *Public*

1. Executive Summary

- 1.1 The London Borough of Havering have consulted on the Havering Local Plan Proposed Submission Version 2016-2031. As a neighbouring borough, Brentwood has had on-going discussions regarding key strategic issues to concern to both boroughs under the Duty to cooperate.
- 1.2 This report highlights the key strategic issues and considers how they are approached by Havering and potential impacts of their Draft Local Plan.

2. Recommendation(s)

- 2.1 To approve the draft Brentwood Borough response to the London Borough of Havering Local Plan Proposed Submission Version 2016-2031.**

3. Introduction and Background

- 3.1 There is a requirement for each local planning authority to undertake Duty to Cooperate discussions with neighbouring authorities over strategic issues relating to the development of the two boroughs local planning documents. (Localism Act 2011). The Duty to Cooperate discussions have been taken at officer level and are on-going as the two boroughs develop their local planning documents.
- 3.2 Brentwood has been undertaking these discussions with the London Borough (LB) of Brentwood for a number of years, particularly regarding the issues of each boroughs new housing locations, new Gypsy and Traveller sites and strategic road network congestion. Previous comments received from Havering on the Brentwood Borough Draft Local Plan

consultation (2016) highlighted A127 congestion as a primary issue for discussion.

- 3.3 The London Borough of Havering has not approached Brentwood Borough to consider taking any of their identified need for new homes or any additional Gypsy and Traveller pitches. Accordingly, the comments on the LB Havering Proposed Submission Local Plan has been limited to high level overview relating only to these strategic issues.

4. Issue, Options and Analysis of Options

- 4.1 There has been ongoing Duty to Cooperate meetings between Brentwood Borough and London Borough of Havering regarding strategic cross boundary issues. Those of primary concern have been allocation of housing sites, allocation of Gypsy and Traveller sites and in particular the on-going congestion and therefore the impact of future development on the strategic highways, particularly the A127.
- 4.2 LB Havering forms part of the London-wide housing market area with all of the other London boroughs. The Mayor of London, through the preparation of the 2015 London Plan sought to identify both the need for new housing and the potential supply across London. The GLA's Strategic Housing Market Assessment (SHMA) 2013 identifies a need for a minimum of 490,000 new homes in London between 2015-2026 (or 49,000 new homes per annum). In comparison, the GLA Strategic Housing Land Availability Assessment 2013 found that London has capacity for at least 420,000 additional homes or 42,000 per annum.
- 4.3 Based on this evidence, the London Plan sets out average annual minimum housing supply targets for each borough until 2025. For LB Havering, the target is a minimum of 11,701 new homes over the period 2015-2025.
- 4.4 The London Plan states that the annual average (1,170) should be rolled forward for the remainder of the Plan period and should draw on housing benchmarks in developing their housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need and supply within London in line with the NPPF.
- 4.5 LB Havering has reviewed their past performance of housing completions and consider that they have met or exceeded targets 5 out of the last 12 years, with under delivery occurring only with the housing market cycle. This shows past periods of under delivery are not persistent, that housing

delivery has significantly increased since 2013/14 and therefore Havering consider that they are able to boost their housing delivery.

- 4.6 With proposals to continue estate regeneration, use of two strategic development sites and past performance, LB Havering do not consider that they have the special circumstances at this time to undergo release of Green Belt to provide for additional new homes.
- 4.7 Evidence demonstrates that all Gypsy and Traveller families within LB Havering currently occupy privately owned sites within the Green Belt. LB Havering have not been able to identify any deliverable sites outside the Green Belt to accommodate pitches and propose to meet the identified Gypsy and Traveller need by formalising, and where appropriate, the consideration of limited intensification of the existing occupied sites within the Green Belt.
- 4.8 LB Havering intend to protect and enhance Green Belt within the borough and to provide continued protection by not proposing release of Green Belt designated land for new housing development of green field sites with the Green Belt.
- 4.9 LB Havering propose the support for safe and efficient use of the highways and the proposals to avoid or mitigate adverse impacts as a key priority within their Local Plan. Brentwood Borough have worked with LB Havering in an active role in the A127 Corridor for Growth project through cross borough engagement with Essex County Council and and Essex boroughs, to seek improvements to the A127 that will facilitate growth along this corridor.
- 4.10 Brentwood Borough are therefore signatories to the Statement of Common Ground on Strategic Transport Issues (SoCM). The SoCG focusses on the impact cross-boundary growth will have on strategic routes particularly the A127 corridor and details how the participating authorities will work collaboratively to address the identified issues.

5. Reasons for Recommendation

- 5.1 LB Havering has not approached Brentwood Borough to request that Brentwood Borough takes any housing or any Gypsy and Traveller sites from LB Havering. Therefore, Brentwood Borough, does not object to the LB Havering Draft Local Plan 2017.
- 5.2 Should this request be made it must be acknowledged that as a borough entirely within the London Metropolitan Green Belt, it is not possible for

Brentwood to release Green Belt to meet this need for other Planning Authorities.

6. References to Corporate Plan

- 6.1 The LB Havering Local Plan will have a close relationship with the emerging Brentwood Local Plan, the production of which is a key priority in the Council's Corporate Plan.

7. Implications

Financial Implications

Name/Title: Jacqueline Van Mellaerts, Financial Services Manager

Tel/Email: 01277 312829/jacqueline.vanmellaerts@brentwood.gov.uk

- 7.1 None directly arising from this report.

Legal Implications

Name & Title: Surinder Atkar/Senior Planning Solicitor

Tel & Email: 01277 312500/surinder.atkar@brentwood.gov.uk

- 7.2 The Localism Act 2011 places a legal duty on local planning authorities and other defined local bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. It is not a duty to agree, but local planning authorities must make every effort to secure the necessary cooperation before they submit their Local Plan for examination. The cooperation should produce effective and deliverable policies on strategic cross boundary issues.

8. Background Papers

- 8.1 London Borough of Havering Local Plan Proposed Submission Version 2016-2031

9. Appendices to this report

- 9.1 Appendix A - Response letter to London Borough of Havering Local Plan Proposed Submission Version 2016-2031

Report Author Contact Details:

Name: Jill Warren
Telephone: 01277 312609
E-mail: jill.warren@brentwood.gov.uk

