



Sustainability Appraisal for the Havering Local Plan

SA Report to accompany the
Havering Local Plan Proposed Submission document

Non Technical Summary

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Quality information

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1. What is sustainability appraisal?

The London Borough of Havering is currently preparing a new Local Plan to replace the existing planning policies in the Havering Local Development Framework. A sustainability appraisal (SA) has been undertaken to inform the development of the Local Plan.

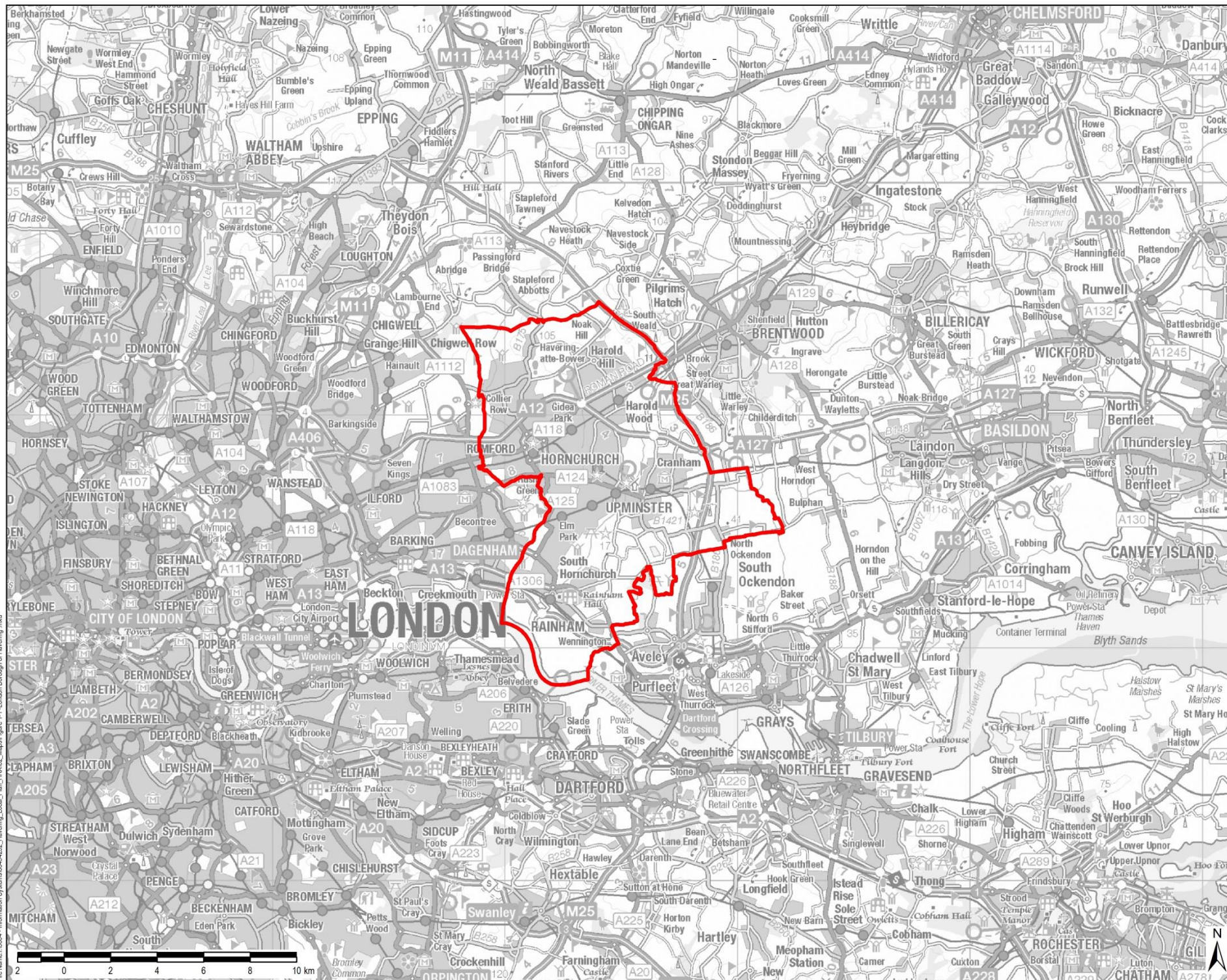
SA is a process that Local Planning Authorities such as the London Borough of Havering are legally bound to undertake for their Local Plans. The SA has incorporated a strategic environmental assessment (SEA) process as required by the SEA Regulations. Local Planning Authorities use SA to assess Local Plans against a set of sustainability objectives and the baseline developed in consultation with interested parties. The purpose of the appraisal is to help identify (and so be in a better position to avoid) negative environmental and socio-economic effects and identify opportunities to improve the environmental quality of Havering and the prosperity and quality of life of the borough's residents through the Local Plan.

2. Details of the Havering Local Plan


The London Borough of Havering is currently preparing a new Local Plan to replace the existing planning policies in the Havering Local Development Framework. The new Local Plan, which will cover 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. It is currently anticipated that the Local Plan will be submitted to the Secretary of State for Communities and Local Government later in 2017 and then undergo an independent Examination in Public overseen by a Planning Inspector appointed by the Secretary of State.

Table 2.1: Key facts relating to the Havering Local Plan


Name of Responsible Authority	London Borough of Havering
Title of Plan	Havering Local Plan
Subject	Spatial plan
Purpose	The Local Plan will guide future development and land use within the London Borough of Havering over the next 15 years up to 2031. Replacing the Havering Local Development Framework, the Local Plan together with the London Plan will comprise the Development Plan for the borough and will be the primary basis against which planning applications are assessed.
Timescale	To 2031
Area covered by the plan	London Borough of Havering (see map below)
Summary of content	The Local Plan will set out the vision, strategy and policies to manage growth and development in Havering in the period to 2031. It will indicate the broad locations in the borough for future housing, employment, retail, leisure, transport, community services and other types of development. The Local Plan will subsequently be supported by a separate Detailed Sites Local Plan. This will identify individual sites for specific uses that are intended to assist in delivering the priorities, objectives and strategy set out in the Local Plan.
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3. Purpose of the SA Report

The SA Report, which accompanies the current consultation on the *Havering Local Plan – Proposed Submission* document is the latest document to be produced as part of the SA process.

The purpose of the SA Report is to:

- Identify, describe and evaluate the likely significant effects of the Local Plan document and any reasonable alternatives; and
- Provide an opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA process.

The SA Report contains the following elements:

- An outline of the contents and main objectives of the Local Plan and its relationship with other relevant policies, plans and programmes;
- A description of the current state of the environment and key sustainability issues;
- The SA Framework of objectives and appraisal questions against which the Local Plan document has been assessed;
- The appraisal of alternative approaches for certain Local Plan topics;
- The likely significant effects of the Local Plan;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Local Plan;
- A proposed monitoring programme for the SA; and
- The next steps for the Local Plan and the accompanying SA process.

4. Appraisal of reasonable alternatives for the Local Plan

A key requirement of the SEA Regulations is to appraise ‘reasonable alternatives’ for the Local Plan. To address this requirement, a number of alternative approaches have been considered in relation to the scale, location and distribution of new housing to be taken forward through the Local Plan.

The options considered as reasonable alternatives, and the choice of the preferred strategy taking into account the findings of the appraisal, are presented below. Detailed appraisal findings are presented in the main body of the SA Report.

4.1 Housing numbers for the Havering Local Plan

In November 2016, a revised estimate of objectively assessed housing need (OAHN) for Havering Borough was published.¹ The OAHN has established a need for 1,366 dwellings per annum to be delivered in the borough over the period 2011-2033.

The established OAHN for Havering exceeds the target put forward through the Further Alterations to the London Plan (FALP). The FALP sets out a target of 11,701 dwellings to be delivered in Havering in the period 2015-2025, or 1,170 dwellings per annum to 2025. This figure is considered by the Greater

¹ Opinion Research Services (November 2016). Outer North East London Strategic Housing Market Assessment: Update for Havering, Report of Findings
<https://www.newham.gov.uk/Documents/Environment%20and%20planning/NewhamStrategicHousingMarketAssessment%5B1%5D.pdf>

London Authority to be a minimum; the FALP clearly states that Havering Council should seek to 'achieve and exceed' this target.

The London Plan is currently under review. As part of this process, housing targets for each London Borough will be updated. This will, however, be beyond the timeframe for the Havering Local Plan, and it is currently anticipated that the updated London Plan will undergo Examination in Public in summer 2018.

4.2 Options considered as reasonable alternatives

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.

In light of the OAHN established for Havering and the FALP target for the borough, five spatial strategy options were developed and appraised through the SA process. These reflect uplifts to the FALP target and OAHN figure, and range 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.

The spatial strategy options, and the rationale for each one, are presented in Table 4.1. These options reflect existing and likely land availability in the borough, as reflected by the outcomes of ongoing evidence base studies being undertaken to inform the Local Plan. A more detailed breakdown of the distribution of housing considered through these options is presented in the main body of the SA Report.

Table 4.1: 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 12,529 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 13,829 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 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). ²
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 14,061 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.

² 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 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 12,528 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.
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 15,493 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.

4.3 Overview of reasons for choosing the preferred spatial strategy

The following overview sets out the London Borough of Havering’s reasons for selecting the preferred spatial strategy approach for the Local Plan in light of the appraisal findings.

The Council’s preferred strategy is Option 1, which the appraisal finds to perform relatively well as it delivers an appropriate level of growth which is delivered on previously developed land, in accessible locations and supported by services and facilities.

Whilst the preferred strategy does not perform negatively against any of the objectives considered through the SA process, the appraisal highlights that other options could provide additional sustainability benefits in relation to certain themes. On balance, however, the Council considers the preferred strategy to be the most sustainable.

The reasons are set out below.

Biodiversity – The appraisal finds that increased housing growth delivered through Options 2, 3 and 5 increases the likelihood of negative effects on the designated sites and habitats and species present in the borough. The preferred strategy proposes a lower number of homes, so limiting potential impacts on biodiversity. As the preferred strategy does not release any Green Belt, the potential impacts on key habitats of ecological importance in the Green Belt are avoided, in contrast to Options 4 and 5. The Council therefore considers the preferred strategy the most sustainable from a biodiversity perspective.

Climate change – It is considered that Options 2, 3 and 5 have the greatest potential to support the use of sustainable transport modes and minimise the need to travel due to the increased number of homes being delivered in accessible areas. Increased development in the Rainham and Beam Park area specifically provides the opportunity to promote low carbon lifestyles. However, these benefits will also be achieved through the preferred strategy where a lower number of homes are directed towards these areas. Options 4 and 5 are deemed as less sustainable as development in the Green Belt would increase car trips with implications for greenhouse gas emissions. For the reasons above, the preferred strategy is seen to make positive contributions in relation to the climate change theme.

Land soil and water resources – Only Options 4 and 5 would facilitate Green Belt release. This has the potential to lead to the loss of greenfield land as well as the loss of higher quality agricultural land. It is not possible to differentiate between options on the subject of water resources. The preferred strategy has together with Option 4 the most potential to limit waste arisings, due to a lower number of homes being delivered. The Council considers that for the reasons above, of all of the options, the preferred strategy will do most to limit impacts on land soil and water resources.

Environmental quality – Increased development in accessible locations through Options 2, 3 and 5 has the potential to promote the use of sustainable transport modes and minimise the need to travel,

therefore helping to limit emissions from transport. These options also have the most potential for the remediation of brownfield sites through increased housing delivery. However, Options 2, 3 and 5 also have the most potential to lead to cumulative impacts on air, water and groundwater quality through facilitating a higher level of growth. The preferred strategy will help limit emissions, whilst also promoting the remediation of brownfield land, and (to a lesser extent) limiting impacts on water and groundwater quality. As such, the Council considers that the preferred strategy appropriately balances the various elements effecting environmental quality.

Historic Environment, Landscape and Townscape – Option 4, through promoting lower levels of growth in Romford, Rainham and Beam Park, Hornchurch and Upminster could be seen to have more limited effects on conservation areas and heritage assets in these areas. However, the appraisal also suggests that, if sensitively designed, increased development in these areas through Options 2, 3 and 5 could result in significant opportunities to enhance the fabric and setting of heritage assets. The Council considers that the level of growth proposed in the preferred 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.

Population and Community – Whilst the preferred strategy exceeds the minimum housing target set out in the Further Alterations to the London Plan, Options 2, 3 and 5 meet (and exceed) the established Objectively Assessed Need for Havering. It is recognised that increased delivery in accessible locations through these options could have potential to support accessibility to existing community facilities, promote more active lifestyles and facilitate access to green infrastructure networks.

However, an increased level of growth in comparison to the preferred strategy also has the potential to overburden existing facilities and put pressures on existing infrastructure. The Council considers that the preferred strategy supports a balance between an appropriate level of growth whilst supporting the provision of facilities and infrastructure to support this. Unmet housing need is dealt with on a London-wide basis through the London Plan.

Health and Wellbeing – It is recognised that increased growth in accessible locations through Options 2, 3 and 5 has the potential to support accessibility to community facilities and promote active travel. The drawback of additional growth is that increased road safety issues and impacts on air and noise as a result of an increased level of development could adversely impact on the health and wellbeing of residents. As stated above, an increased level of growth compared to the preferred strategy also has the potential to overburden existing facilities and put pressure on existing green infrastructure networks. The Council considers that the preferred strategy provides an optimal balance between an appropriate level of growth and the ability to deliver the provision of facilities and infrastructure to support this.

Transportation – The appraisal finds that the options which promote a higher number of homes in accessible locations, Options 2, 3 and 5, have the most potential to support the use of sustainable modes of transport and minimise the need to travel. However, the appraisal also recognises that all options have the potential to support development at existing and future public transport nodes and offer opportunities for contributing or realising the need for new infrastructure to accompany new development. Therefore, the Council deems the preferred strategy to sufficiently promote sustainable travel by focusing development in accessible locations.

Economic Vitality Employment and Skills – Whilst the delivery of a larger number of dwellings through Options 2, 3 and 5 has the potential to support the economic viability and vitality of the borough, the appraisal recognised that all of the options are likely to have a long-term positive effect on the economy. The Council believes that the preferred strategy is therefore justified in the light of finding an optimal balance between facilitating and promoting economic growth whilst supporting the provisions of the remaining sustainability objectives.

The options and particularly the preferred strategy have been informed by the development capacity of the borough and the context provided by the NPPF and London Plan:

- Romford is identified as a Metropolitan Centre in the London Plan and is the largest town centre in the borough. Romford has scope for development across a number of well-located and well connected sites. From 2018, it will benefit from improved rail services as a result of the arrival of Crossrail. Its potential has been recognised by its designation as a Mayoral Housing Zone. The next London Plan will re-affirm the role of Romford by designating it as an Opportunity Area in recognition of its potential to address an important part of Havering's growth potential.
- Rainham and Beam Park is already identified within the London Riverside Opportunity Area which includes land in both Havering and adjoining Barking and Dagenham. The scope for this is as a result of the provision of a new station at Beam Park and the opportunity to provide space for essential local services. Rainham and Beam Park was granted Housing Zone status in 2015 which will help accelerate residential development in the area.
- The London Plan identifies the six District Centres of Hornchurch, Upminster, Collier Row, Harold Hill, Rainham and Elm Park in the borough, which should be the main foci for development and intensification. Hornchurch and Upminster are the largest district centres with the highest public transport access rating.
- Both the National Planning Practice Guidance and the London Plan express a support for protecting the Green Belt from inappropriate development, except in very special circumstances.

5. Development of planning policies for the Local Plan

The planning policies for the Local Plan have been developed in response to government guidance (e.g. the National Planning Practice Guidance), evidence base studies, the appraisal of reasonable alternatives undertaken through the SA process, and to reflect consultation responses on plan-making to date, including consultation undertaken for the Local Plan in 2015.³

Following the preparation of an initial version of the draft Local Plan in early 2017, the draft policies presented in the plan underwent an initial assessment through the SA process. At this stage, a number of recommendations were made with the aim of enhancing the sustainability performance of the plan.

These were as follows:

- The Nature Conservation policy seeks to ensure development protects and enhances designated nature conservation sites present in the borough 'when development is on or adjacent to such a site'. Given that development which takes place further away from a designated site may still have impacts on site integrity (as reflected by the extent of Impact Risk Zones for Sites of Special Scientific Interest (SSSIs); which often extend a number of kilometres from a site), it was recommended that the policy is updated. In this context an appropriate update to the policy would be to refer to development which has the potential to impact on an SSSI, Local Nature Reserve or Site of Interest for Nature Conservation rather than only development which is located "on or adjacent" to a site.
- Given the proximity of the Rainham and Beam Park SDA to the Ingrebourne Marshes SSSI and the Inner Thames Marshes SSSI, and its presence within the Impact Risk Zone for the SSSIs, there is further scope for the policy for the SDA to acknowledge the need for adverse effects on the integrity of these key nationally designated sites to be avoided, and enhancements achieved.

³ London Borough of Havering (February 2015) A New Local Plan for Havering
<https://www3.havering.gov.uk/Documents/Planning/local-plan-questionnaire.pdf>

This initial Local Plan consultation document identified a number of strategic priorities for the Local Plan to address, and invited respondents to comment on these together with a series of issues for the borough.

- Whilst the Heritage Assets policy sets out a number of provisions for conservation areas in the borough, there is further potential for the policy to more explicitly seek to ensure that all development in conservation areas takes into account the relevant Conservation Area Appraisal or Management Plan. This would provide a robust focus for the protection and enhancement of local distinctiveness in conservation areas, and help ensure that development within conservation areas in the borough provides an appropriate degree of protection for conservation areas' integrity.

The draft Local Plan was then updated to reflect these recommendations before being published for consultation.

6. Appraisal of the current version of the Local Plan

6.1 Appraisal of plan policies

The SA Report presents an appraisal of the current version of the Local Plan. As such, the policies presented in the current *Havering Local Plan – Proposed Submission* document have been appraised alongside the proposed development strategy for the Local Plan in Part 2 of the SA Report.

The table below presents a summary of the key potential significant effects identified through the appraisal of the proposed planning policies. These have been presented under nine sustainability themes.

Table 6.1: Potential significant effects resulting from the plan

Likely significant effect	Effect dimensions
Biodiversity	
Improved borough-wide ecological connections	Direct, long-term, permanent and positive.
Improved ecological resilience	Direct, long-term, permanent and positive.
'Wider' ecological benefits	Direct, long-term, permanent and positive.
Increased habitat and greenspace through green infrastructure enhancements	Direct and indirect, long-term, permanent and positive.
Climate Change	
Reduction in greenhouse gas emissions through reducing need to travel and modal shift.	Direct, long-term, permanent and positive.
Reduction in greenhouse gas emissions from development of low carbon and renewable energy installations and the promotion of energy efficient development.	Direct and indirect, long-term, permanent and positive.
Enhancements to the resilience of the borough to the effects of climate change.	Direct and indirect, short, medium and long-term, permanent and positive.
Land, Soil and Water Resources	
Efficient use of land through an intensification of uses and a focus on the use of previously developed land.	Direct, long-term, permanent and positive.
Protection of agricultural land.	Direct and indirect, long-term, permanent and positive.
Environmental Quality	
Limitation of the effects of housing and employment growth on existing air quality issues in the borough	Direct, long-term, permanent and positive.

Likely significant effect	Effect dimensions
Limitation of the effects of housing and employment growth on noise quality in the borough	Direct, long-term, permanent and positive.
Limitation of the effects of housing and employment growth on water quality in the borough	Direct, long-term, permanent and positive.
Historic Environment, Landscape and Townscape	
Enhanced townscape character, public realm and local distinctiveness.	Direct and indirect, long-term, permanent and positive
Protection and enhancement of heritage assets, including repair and reuse where appropriate.	Direct, long-term, permanent and positive.
Revitalisation of features and areas of historic environment value in the borough.	Direct and indirect, long-term, permanent and positive.
Population and Community	
Increased delivery of affordable housing.	Direct, long-term, permanent and positive overall.
Provision for gypsy and traveller sites to meet projected need.	Direct, long-term, permanent and positive overall.
Improved access to services and facilities.	Direct, long-term, permanent and positive overall.
Increased use of sustainable transport modes, including public transport and walking and cycling.	Direct, long-term, permanent and positive overall.
Enhanced provision of community infrastructure.	Direct, long-term, permanent and positive overall.
Provision of improved accessibility to multi-functional open spaces.	Direct, long-term, permanent and positive overall.
Reduced dependency on the private car.	Direct, long-term, permanent and positive overall.
Maintain and enhance the vitality of communities by locating housing where it sustains balanced communities.	Direct, long-term, permanent and positive overall.
Maintain and enhance the vitality of communities by securing the delivery of community infrastructure.	Direct, long-term, permanent and positive overall.
Health and wellbeing	
Improvements in mental and physical health and wellbeing through enhancements to the quality of the built environment and public realm	Indirect, long-term, permanent and positive.
Improvements to health and wellbeing through prioritising transport modes other than cars and improving accessibility to services and facilities.	Indirect, long-term, permanent and positive.
Enhancements of active travel opportunities.	Direct, long-term, permanent and positive overall.
Enhancements to strategic and local green infrastructure networks, promoting leisure and recreational opportunities and active lifestyles.	Indirect, long-term, permanent and positive.
Enhanced provision of community infrastructure.	Direct, long-term, permanent and positive overall.
Transportation	
Limitation of traffic growth and congestion resulting from housing and employment growth in the borough.	Direct, long-term, permanent and positive.

Likely significant effect	Effect dimensions
Enhancements to active travel networks in the borough, including pedestrian and cycle networks.	Direct, long-term, permanent and positive.
Enhanced accessibility to public transport networks, including rail and bus.	Direct, long-term, permanent and positive.
Improved access to services and facilities, and an associated reduction in the need to travel to such amenities.	Direct, long-term, permanent and positive.
Increased permeability of the townscape through enhancements to the quality of the public realm.	Direct, long-term, permanent and positive.
Economic Vitality, Employment and Skills	
Diversification of the borough's economy.	Direct, indirect, long-term, permanent and positive.
Promoting the economic vitality of Romford as a Metropolitan Centre.	Direct, indirect, long-term, permanent and positive.
Promoting the economic vitality and viability of the borough's district centres.	Direct, indirect, long-term, permanent and positive.
Enhancing economic opportunities in the Rainham and South Hornchurch area.	Direct, indirect, long-term, permanent and positive.
Promotion of employment opportunities in the borough.	Direct, indirect, long-term, permanent and positive.
Supporting a growth of skills in the borough.	Direct, indirect, long-term, permanent and positive.

6.2 Appraisal of cumulative effects

In combination effects can also result from the combined impacts of a plan with impacts of another plan or initiative. The Havering Local Plan therefore has the potential to combine with other planned or on-going activities in the vicinity of the borough to result in cumulative effects.

Potential effects which may occur as a result of the in-combination effects of the Local Plan and other plans and proposals in the area include the following:

- Increases in traffic flows and congestion from the in-combination effects of development, with potential impacts on air and noise quality. However the in-combination effects of proposals on enhancing public transport and pedestrian and cycle infrastructure may help limit potential negative effects and secure positive effects in this regard.
- Incremental erosion of the Metropolitan Green Belt as a result of the need to deliver objectively assessed need, and associated cumulative impacts on landscape character from new development.
- Cumulative impacts on ecological networks. This is from the in-combination effects of new development and associated infrastructure on habitats and biodiversity corridors. However, enhancements to green infrastructure provision facilitated through Local Plan proposals and other projects in the area have the potential to support local, sub-regional and regional ecological networks.
- Impacts on flood risk from the in-combination effects of new development, including relating to surface water and fluvial flooding. However, the provisions of the NPPF and measures and policy approaches implemented through the relevant plans and proposals will limit the significance of effects.
- Improvements to accessibility resulting from the in-combination effects of enhancements to public transport and walking and cycling networks.

- Impacts on the urban heat island effect (a key likely impact of climate change) from an intensification of land uses across the wider area. This however has the potential to be offset by enhancements to sub-regional green infrastructure networks and open space provision.

As highlighted above, for many potential cumulative effects, the policy approaches proposed by the current version of the Local Plan will help reduce the significance of these in-combination impacts. However monitoring for the various Local Plans and, more broadly, the London Plan will be a key means of ensuring that unforeseen adverse environmental effects are highlighted, and remedial action can be taken where adverse environmental effects arise.

No additional mitigation measures or recommendations have been proposed relating to the potential effects identified. This reflects the carefully designed spatial strategy and robust policy approaches which are put forward through the Local Plan. In particular the Local Plan will help limit the magnitude and scale of the potential negative environmental effects associated with the delivery of in the region of 17,550 homes over the 15 year plan period and employment land in the period to 2031.

It should be noted, however, that the policies put forward through the current version of the plan do not prevent the likelihood of negative effects taking place, including those highlighted in the SA Report for the proposed site allocations. Instead they reduce the likelihood of significant negative effects resulting from new development in the London Borough of Havering. It should also be noted that the delivery of housing allocations and employment provision in the borough will require inevitable trade-offs to take place between the various environmental, social and economic elements which have been highlighted through the SA process to date.

In order to understand these trade-offs during the implementation of the Local Plan, the SA Report presents a monitoring programme to evaluate the ongoing effects of the plan.

7. Next steps

The SA Report accompanies the current consultation on the Local Plan (*Havering Local Plan – Proposed Submission* document).

Consultation will conclude in September 2017. The Local Plan document and accompanying information (including consultation responses and the SA Report) will subsequently be submitted by the London Borough of Havering to the Planning Inspectorate for Examination later in 2017.

